

EPA REGISTRATION NUMBER 239-2730



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 7, 2016

Jane Rothwell
Senior Analyst, Regulatory Affairs
The Scotts Company LLC
14111 Scottslawn Road
Marysville, OH 43041

Subject: CSF Amendment –Revised Basic CSF
Product Name: ORTHO ROACH BAIT
EPA Registration Number: 239-2730
Application Date: 09/13/2016
Decision Number: 521758

Dear Ms. Rothwell:

The Confidential Statement of Formula (CSF) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

Please note that the record for this product currently contains the following CSF:

- Basic CSF dated 08/26/2016

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, you may contact Elizabeth Fertich at 703-347-8560 or via email at fertich.elizabeth@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Saunders", followed by the word "For" in a cursive script.

Jennifer Saunders, Ph.D.
Product Manager 04
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Note to File

Date: November 7, 2016

Registration Number: 239-2730

Decision Number: 521758

PM/RM Name: Bo Davis, PM 3 (acting PM 4)

Reviewer: Elizabeth Fertich

E. Fertich 11/7/16

Background: The registrant submitted a revised Basic CSF to update the upper certified limit for the technical source. The CSFs and cover letter were beaned to CITAB under DP 436115.

Decision: The review for DP 436115 incorrectly states that the CSF was a 100% repack of [REDACTED]. The changes made to the certified limits for the technical source of the active ingredient on the Basic dated 08/26/2016 for 239-2730 are consistent with the currently approved Basic for [REDACTED] dated 02/29/2012.

Product ingredient source information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

DOCUMENT CONTAINS CONFIDENTIAL INFORMATION

DATE OUT: November 3, 2016

DP BARCODE No.: 436115

File Symbol No.: 239-2730

ACTION CODE: 345

DECISION No.: 521758

PRODUCT NAME: Ortho® Roach Bait

SUBJECT: PRODUCT CHEMISTRY REVIEW OF MP [] EP [X]

COMPANY: The Scotts Company

FOOD USE: No

PC Codes: PC Codes: 118401

FROM: William Herald / Microbiologist (MS) / Chemist, RHES/Registered Sanitarian
Product Chemistry Team
Chemistry, Inerts and Toxicology Assessment Branch (CITAB) RD (7505P)

W. Herald
S. R.
11.3.16

TO: Elizabeth Fertich / Laura Bacon, RM 04
Invertebrate and Vertebrate Branch 1 / RD (7505P)

With a letter dated September 13, 2016 registrant has submitted a revised Basic CSF formulation dated August 26, 2016 to support the registration of the subject end-use product, "Ortho® Roach Bait" which is a 100% repack of [REDACTED]. Registrant has increased the upper limit of active ingredient by 10%. The CITAB has been asked to review the said amended formulation and determine its acceptability.

CONCLUSION:

The CITAB has reviewed the newly proposed amendment to the 100% repack CSF formulation (dated 6/6/16) and has found it not to be acceptable. Changing the parameters of the CSF of a 100% Repack is not permitted.

See Note to File 11/7/16

*this product is not 100% re-pack of [REDACTED]
It is a mix of [REDACTED]*

Product ingredient source information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 16, 2016

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MR. JAMES WALLACE
THE SCOTTS COMPANY
D/B/A THE ORTHO GROUP
14111 SCOTTS LAWN ROAD
MARYSVILLE, OH 43041-

PRODUCT NAME: ORTHO ROACH BAIT
COMPANY NAME: THE SCOTTS COMPANY
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 239-2730
EPA RECEIPT DATE: 09/15/16

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 4, at (703) 305-7390.

Sincerely,

A handwritten signature in black ink, appearing to be "S. [unclear]".

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

{992103r~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 4

Receipt No.

S- 992103

EPA File Symbol/Reg. No.

239-2730

Pin-Punch Date:

9/13/2016

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: 

Date: 9-16-16

Remarks:



The Scotts Company LLC

and Subsidiaries

September 13, 2016

Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

ATTN: Jennifer Saunders, PM #4
Invertebrate-Vertebrate Branch 1

SUBJECT: Ortho Roach Bait
EPA Reg. No. 239-2730
Product Chemistry Amendment

Dear Ms. Saunders:

The Scotts Company d/b/a The Ortho Group (hereafter "Scotts") is submitting a fast track product chemistry amendment to update the Basic confidential statement of formula (CSF) on file.

This product is a 100% composition of [REDACTED].
Scotts is updating our CSF to align with the CSF on file from [REDACTED]. The CSF has been updated as follows:

Box 14: Certified Upper limit for active ingredient expanded (+10%)

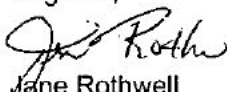
This enclosed Basic CSF dated 8-26-16 should supercede the Basic CSF on file dated 4-21-15.

The following documents are enclosed to support this submission:

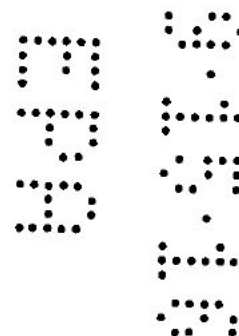
- Completed Application for Pesticide Registration/Amendment Form (8570-1)
- One copy of the currently approved Basic CSF dated 4-21-15 (for reference)
- Two copies of the updated Basic formula dated 8-26-16


Please contact me at 937-578-5984 or by email at Jane.Rothwell@Scotts.com should you have any questions regarding this submission.

Regards,



Jane Rothwell
Senior Analyst, Regulatory Affairs
Enclosures



EPA United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 239-2730		2. EPA Product Manager Jennifer Saunders	
4. Company/Product (Name) The Ortho Group / Ortho Roach Bait		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) The Scotts Company d/b/a The Ortho Group PO Box 190 Marysville, OH 43040 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	
Section II			
<input checked="" type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification - Explain below.		<input type="checkbox"/> Final printed labels <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - Explain below.	
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Fast Track product chemistry amendment. See cover letter for details. Email: Jane.Rothwell@Scotts.com			
Section III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No *Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per Container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt. No. per Container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	
		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
Section IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Jane Rothwell		Title Sr. Analyst, Regulatory Affairs	Telephone No. (Include Area Code) : : : (937) 578-5984
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped) : : : : : : : : : : : :
2. Signature BY: 		3. Title Sr. Analyst, Regulatory Affairs	
4. Typed Name Jane Rothwell		5. Date September 13, 2016	

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9

PROCESSING REQUEST

Reg # 229-2730

Decision # 505692

Description: New product

Electronic Label & Letter
(see PPLS): OR

Non Electronic
Label & Letter
(Scanning required):

☒ Dated: 1/19/16

☐ Dated:

Only one label type should be selected

Other Materials Sent (see jacket):

☒ New CSF(s) Dated: Basic 4/21/15

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Elizabeth Fertich

Division: RD/IVB1

Phone: 703-347-8560

Date: 1/19/16



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:

239-2730

Date of Issuance:

1/19/16

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

Term of Issuance:

Unconditional

Name of Pesticide Product:

ORTHO ROACH BAIT

Name and Address of Registrant (include ZIP Code):

Jane Rothwell
Senior Analyst, Regulatory Affairs
14111 Scottslawn Road
Marysville, OH 43041

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is unconditionally registered in accordance with FIFRA section 3(c)(5) provided that you:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product when the Agency requires all registrants of similar products to submit such data.
2. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, "EPA Reg. No. 239-2730."

Signature of Approving Official:

Jennifer Saunders, Ph.D., Product Manager 04
Invertebrate & Vertebrate Branch 1, Registration Division (7505P)
Office of Pesticide Programs

Date:

1/19/16

3. Submit one copy of the revised final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 04/21/2015

If you have any questions, you may contact Elizabeth Fertich at 703-347-8560 or via email at fertich.elizabeth@epa.gov.

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

Note to PM: This section for commercial use

ORTHO ROACH BAIT

RECOMMENDED FOR USE BY COMMERCIAL APPLICATORS

Syringe packaging is for use as a syringe or with other bait devices.

Cartridge packaging is for use with XACTADOSE[®] Precision Baiting System.

For Pressurized Bait System: The pressurized bait system package with the 4-inch extension tube is intended for precision baiting in a crack and crevice application.

FOR USE IN AND AROUND HOMES, COMMERCIAL, INDUSTRIAL, OR INSTITUTIONAL AREAS

ACTIVE INGREDIENT:

Hydramethylnon

[tetrahydro-5,5-dimethyl-2(1H)-pyrimidinone(3-[4-(trifluoromethyl)phenyl]-

1-(2-[4-(trifluoromethyl)phenyl]ethenyl)-2-propenylidene)hydrazone]..... 2.0%

OTHER INGREDIENTS:.....98.0%

TOTAL: 100.00%

Keep out of reach of children. CAUTION

See back panel for additional First Aid, Precautionary Statements and Directions for Use

Use Only in Areas Not Easily Accessible to Children and Pets

Net weight xxxxxxxxx

FIRST AID [icon]

HAVE LABEL WITH YOU WHEN OBTAINING TREATMENT ADVICE
IF ON SKIN:

- Take off contaminated clothing
- Rinse skin immediately with plenty of water for 15-20 minutes
- Call poison control center or doctor for treatment advice

Hot line number: Have the product container or label with you when calling a poison control center or doctor or going for treatment. In case of emergency, call day or night 800-225-2883.

ACCEPTED

Jan 19, 2016

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 239-2730

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PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if absorbed through skin. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

For Pressurized Bait System:

PHYSICAL AND CHEMICAL HAZARDS

Contents under pressure. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting. Do not mix or allow to come in contact with an oxidizing agent. Hazardous chemical reaction may occur.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ THIS LABEL: Read this entire label and follow all use directions and use precautions. Use only for the sites, pests and application methods described on this label.

[Insert Product name] may be used as a spot or crack and crevice treatment for the control of cockroaches (including carbamate, organophosphate and pyrethroid resistant strains) in and around homes and the non-food/feed areas of institutional, warehousing and commercial establishments (such as groceries and supermarkets; meat, poultry and shell egg grading plants; hotels and motels; hospitals and nursing homes; schools; laboratories; computer facilities; sewers; buses, boats, ships, trains, and planes; pet shops; and zoos).

Nonfood areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries, and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

[Insert Product name] may be used only as a crack and crevice treatment in food/feed areas of restaurants and other commercial or institutional food handling establishments, and food manufacturing, processing, storage and warehousing facilities. Food areas include areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups) and distribution facilities. Serving areas (when food is exposed and facility is in operation) are also considered food areas. Serving areas are areas where prepared foods are served, such as dining rooms, but excluding areas where foods may be prepared or held.

USE RESTRICTIONS

APPLICATIONS OF THIS PRODUCT IN THE FOOD/FEEDEAS OF FOOD/FEEDE-HANDLING ESTABLISHMENTS OTHER THAN AS A CRACK AND CREVICE TREATMENT ARE NOT PERMITTED.

Keep exposed gel away from open food and food contact surfaces. Do not place treatments in locations where routine cleansing operations may transfer diluted bait to food or food preparation surfaces. Do not apply gel to areas where food, food utensils or food processing/food preparation surfaces may become contaminated. Do not apply to areas that are routinely washed such as: cracks and crevices in tops of tables, food preparation, and prepared food holding surfaces, as gel may be removed by washing. Do not apply to surfaces where the temperature exceeds 130°F. Examples include, but are not limited to, portions of stoves, ovens, grills, fume hoods, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers and hot water pipes. Care should be taken to avoid depositing gel onto exposed surfaces. If gel contacts an exposed surface, remove gel and wash exposed surface promptly. Do not apply gel to areas which have been recently sprayed with insecticide, and do not spray insecticide over gel as it may cause the bait to become repellent.

Do not apply this product in a way that will contact any person or pet.

Application rate is dependent on level of infestation and species to be controlled. Numerous smaller placements will provide faster control than few larger spots, especially for German cockroach control. Pest population reduction will be apparent within a week or less.

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Cockroaches become lethargic after ingesting the bait and some may be seen during daylight hours.

For Syringe or Cartridge:

Cockroach Species	Application Rate (g/m ² infested surface areas)	Application Method
Small, such as German or brown-banded	0.25 - 0.50	Thin film or small spots
Large, such as American, smoky-brown or Oriental	0.5 - 1.0	Larger spots

For Pressurized Bait System:

Pressurized Bait System Application Rate: For low to moderate infestations of cockroaches, place 6-12 bait points per square meter. For heavy infestations of cockroaches, 12-24 bait points per square meter. The PRESSURIZED BAIT SYSTEM is approximately 0.04 grams per spot and occupies an area about 3 mm of space.

Cockroach Species	Application Rate (g/m ² infested surface areas)		Application Method
Small, such as German or brown-banded	Low to moderate infestation 0.24-0.50	Heavy infestation 0.5-1.0	Thin film or small spots
Large, such as American, smoky-brown or Oriental	0.5 - 1.0		Larger spots

The lower application rate should be used for low to moderate infestations and the higher rate for more severe infestations. Gel placements should be at or near harborages or aggregation areas, such as cracks and crevices, corners, or areas of movement.

Outdoor Use Directions: For use outdoors to control smokybrown, American, oriental, woods, and other outdoor cockroach species. Apply bait to likely points of entry or harborage sites, such as: the cracks and crevices around windows, doors, porches, sills and screens; holes where pipes or utilities enter a structure; expansion joints; beneath siding or shingles; around firewood piles; eaves; attic or soffit vents; weep holes in masonry; and similar sites. Also, apply bait in likely breeding areas, such as tree holes, behind palm fronds, basements, crawlspaces, attics, garages, or similar sites.

Priority treatment areas may be identified by visual inspection of such areas listed above or aided by trapping techniques or spot flushings.

For Syringe or Cartridge"

To apply gel, remove the cap on nozzle, touch the application tip to surface, and apply. Recapping the application tip after treatment is completed is recommended to preserve bait freshness. The bait will adhere to non-greasy or non-dusty surfaces and will remain palatable to cockroaches for at least 6 months. Repeat treatments as necessary to maintain adequate control.

For Pressurized Bait System: To apply gel, remove the cap on nozzle, touch the application tip to surface and apply. The bait will adhere to non-greasy or non-dusty surfaces and will remain palatable to cockroaches for at least 6 months. Repeat treatments as necessary to maintain adequate control.

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

For syringe or cartridge:

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Wrap used cartridge and place in a trash can.

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep from freezing. Store in a cool dry area, away from heat or open flame. To be stored in original container and placed in areas inaccessible to children.

PESTICIDE DISPOSAL AND/CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor (including toilet) or outdoor (including sewer) drain.

For pressurized Bait System:

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry area away from heat or open flame.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: This container may be recycled in the few but growing number of communities where steel aerosol can recycling is available. Before offering for recycling, empty the can by using the product according to the label. **DO NOT PUNCTURE OR INCINERATE!** If recycling is not available, wrap the container and discard in trash.

[Ortho [or insert sub-registrant company name] Guarantee: If for any reason you, the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.

[phone icon] Questions or Comments Call 1-800-225-2883 or [visit our website] www.ortho.com
[computer icon]

[Ortho & Your Environment:] [Your home is a place for family and pets to enjoy.] [That's why ORTHO® products are designed with care to provide effective solutions to insect problems inside your home.]
[Please follow instructions for appropriate usage, storage and disposal.]

Manufactured for / Distributed For / Sold by:
The Ortho Group
P.O. Box 190
Marysville, OH 43040

[Product of / Made in U.S.A.]
[©XXXX] The Ortho Group, World Rights Reserved.

EPA Reg. No. 239-ETGN

EPA Est. No.

[Superscript is first letter of lot number]

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

Note to PM: This Section for Consumer products packaged in a syringe or bait station

OUTER PACKAGE - COMPLETE LABEL

Alternate Brand Names:

Ortho Roach Bait Gel
Ortho Roach Killer Bait
Ortho Roach Killer Gel

Ortho Home Defense Roach Bait
Ortho Home Defense Roach Bait Gel
Ortho Home Defense Roach Killer Bait
Ortho Home Defense Roach Killer Gel

Ortho Home Defense MAX Roach Bait
Ortho Home Defense MAX Roach Bait Gel
Ortho Home Defense MAX Roach Killer Bait
Ortho Home Defense MAX Roach Killer Gel

Ortho Roach B Gon Roach Bait
Ortho Roach B Gon Roach Bait Gel
Ortho Roach B Gon Roach Killer Bait
Ortho Roach B Gon Roach Killer Gel

For Indoor residential use

ORTHO ROACH BAIT

ACTIVE INGREDIENT:

Hydramethylnon..... 2.0%

OTHER INGREDIENTS:..... 98.0%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

Refer to/see back/side/bottom/other panel[s] for additional Precautionary Statements, First Aid and Directions for Use.

Contains xx [xx oz (g)] Bait Stations
Total Net Weight xx oz (xx g)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through skin. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Physical and Chemical Hazards

Do not mix or allow to come in contact with an oxidizing agent. Hazardous reaction may occur.

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

FIRST AID
IF ON SKIN: <ul style="list-style-type: none"> • Take off contaminated clothing • Rinse skin immediately with plenty of water for 15-20 minutes • Call poison control center or doctor for treatment advice
HOT LINE NUMBER
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1- 800-225-2883 for emergency assistance. Note to Physician: Emergency Information – call 1-800-225-2283.

Note to pm- for product packaged in a Station

[The ORTHO Advantage] [Why/About Ortho [product name]] [How We Work] [How it Works]

It all starts with our [patented/exclusive/advanced] [Clean/Easy/Simple/One-] [Snap] [Activation] [Technology] bait stations. [When you hear that satisfying snap, the station is ready for action.] [Inside the station is a carefully crafted blend/formula/bait [of/with food, water and pesticide/insecticide]. [It's designed for unsuspecting roaches scavenging for their next score.] Once we've lured roaches [in]to the bait [station], our work is done. Roaches naturally do the rest, spreading the bait to kill the [many] [other] roaches hiding in cracks and behind walls. [Remember that for every roach you see, there are hundreds you don't!]]

[Did you know: One visible roach typically means hundreds more are hiding? That's where [product name] can help. It contains a special food blend to draw roaches into the station. Roaches enter the station and eat the bait.] When they leave, their natural behavior spreads the bait, killing the many other roaches hiding in cracks, crevices and behind walls.]

Note to pm- for product packaged in a Syringe

[The ORTHO Advantage] [Why/About Ortho [product name]] [How We Work] [How it Works]

[Ortho helps you reclaim your home from roaches with a potent mix of precision and power.] It all starts with the syringe, ideal for discreet placements [sure] to draw/stir roaches out of/from [their] hiding [places]. Inside each syringe is a carefully crafted blend/formula/bait [of/with food and pesticide/insecticide]. [It's designed for unsuspecting roaches scavenging for their next score.] Once we've lured roaches to the bait, our work is done. Roaches naturally do the rest, spreading the bait to kill the [many] [other] roaches hiding in cracks and behind walls. [Remember that for every roach you see, there are hundreds you don't!]]

[Did you know: One visible roach typically means hundreds more are hiding? That's where [product name] can help. It contains a special food blend to draw roaches to the bait. Roaches eat the bait and their natural behavior spreads the bait, killing the [many] other roaches hiding in cracks, crevices and behind walls.]

Note to PM- For product packaged in a Syringe or Bait Station

[HOW xx /product name WORKS]

- [xx/product name contains food sources to attract roaches.]
- [Roaches enter the station eat the bait, then crawl away to die.]
- [Natural roach behavior spreads the bait to kill other roaches.]

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

READ ENTIRE LABEL. Use strictly in accordance with Precautionary Statements and Directions. Use bait only in areas inaccessible to children and pets.

Use Restrictions

- Do not use near food preparation surfaces
- Do not place bait near areas of excessive heat. [Examples include, but are not limited to: [portions of] stoves, ovens, grills, toasters, and dishwashers.]
- Do not spray the bait stations. Avoid placing bait station on freshly sprayed surfaces.
- Do not allow children or pets to play with bait stations.

Note to PM- For product packaged in a station

[1.] [WHEN TO USE/APPLY: When roaches are present or [roach activity is] suspected.]

[2.] WHERE TO USE/APPLY: Indoors where roaches are suspected or where they travel to find food, water or shelter. [[e.g.] Kitchens/ Bathrooms/ Basements/ Garages/Laundry Rooms/ Porches/Terraces/Decks/Hardscapes.] [Common areas include: along baseboards, in corners of rooms and cabinets, under and behind appliances, under sinks, in pantry, on window sills, around doorways, [and] near garbage cans.]

Note to PM: optional illustrations may be used in conjunction with these steps. See End of label for representative examples of illustrations.

[3.] HOW TO USE/APPLY: Note to PM: Dependent upon station design used, one or more of the these options will be on market label.

1. [[Open carton and] Remove bait stations [from package/pouch].] [Optional Illustration]
2. [Separate stations [along perforation].]
3. **[Option #1]**
[Open/Activate stations by peeling [off/open] label(s)/sticker(s)/film/strip to expose the bait inside.] [Optional Illustration]
[Option #2]
[To open/activate [the Clean/Easy/Simple/One- Snap] stations,] snap open [and tear off] [the end[s]] [to expose bait inside.].] [Fold [the end] and] [Tuck/fold/hook the [upper] slit[s]/notch[es]/end[s]/hook[s]/tab[s] [around/under the [station's] outer edge/base] to hold back/secure [the] [Clean/Easy/Simple/One- Snap] tab[s].] [Optional Illustration]
[Option #3]
[Open/Activate stations by cutting along line/perforation/seam to expose bait inside.] [Optional Illustrations]
4. [Peel label off adhesive sticker on the back of the station.] [Optional Illustration]
5. [Place [the] station(s) [[with] THIS SIDE UP] [[facing upward] in [out-of-the-way locations in] [the] area(s) [that] you have been experiencing or suspect roach activity.] [Optional Illustration]
6. [Replace the bait stations every 6 months, or sooner for heavy roach infestations.]

[4.] AMOUNT TO USE/APPLY:

Place 1 (one) station every 6 (six) ft. [in areas where roach activity is suspected]: [Additional stations may be needed to control heavy infestations.]

[5.] [WHEN TO REAPPLY: [The bait will remain attractive to cockroaches for at least 6 months.] [Monitor regularly and] repeat treatments as necessary to maintain control.]

Note to PM- For product packaged in a Syringe

[1.] WHEN TO USE/APPLY: When roaches are present or [roach activity is] suspected.

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

[2.]WHERE TO USE/APPLY: Indoors along cracks and crevices where roaches are suspected or where they travel to find food, water or shelter. [[e.g.,] Kitchens/ Bathrooms/ Basements/ Garages/Laundry Rooms/ Porches/Terraces/Decks/Hardscapes.] [Common areas include: along baseboards, in corners of rooms and cabinets, under and behind appliances, under sinks, in pantry, on window sills, around doorways, [and] near garbage cans.]

[3.]HOW TO USE/APPLY: To apply, remove the cap on [the] nozzle, touch the application tip to the intended/desired surface, and apply in small dabs or lines across cracks and crevices. Recap the application tip after treatment is complete to preserve bait freshness.

[4.] AMOUNT TO USE/APPLY: For small roaches, [such as German or brown-banded,] apply one 2" - 4" strip of bait or one to two pea-sized dabs of bait every three feet in infested areas. For large roaches, [such as American, Oriental or smoky-brown], apply one to two 4" strips of bait or one to two dime-sized spots of bait every three feet in infested areas.

[5.] [WHEN TO REAPPLY: [The bait will remain attractive to cockroaches for at least 6 months.] [Monitor regularly and] repeat treatments as necessary to maintain control.]

Note to PM- For product packaged in a Syringe or Bait Station

[Optional]

[[HELPFUL TIPS:]

- [Do not place bait stations in areas that have been recently sprayed with insecticide as this may reduce effectiveness.]
- [For heavy infestations, additional bait [stations] may be required.]
- [Monitor [bait] [stations] regularly for activity.]

STORAGE AND DISPOSAL [icon][trash can]



PESTICIDE STORAGE: Keep out of reach of children and animals. Store in original pouch/package/container only. Store in a clean, dry, well ventilated place and avoid excess heat.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Do not reuse or refill this container. If empty: Place in trash or offer for recycling, if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Note to PM- The Warranty/Guarantee or notice statements below may or may not appear on market label.

[Ortho & Your Environment:] [Your home is a place for family and pets to enjoy.] [That's why ORTHO® products are designed with care to provide effective solutions to insect problems inside your home.] [Follow instructions for appropriate usage, storage and disposal.]

[ICON] [People and pets can enter/use the area while stations are in use]

[Notice: To the extent consistent with applicable law, buyer assumes all risks of use, storage or handling of this product not in accordance with directions.]

[The Ortho [or insert sub-registrant company name] [Guarantee: If for any reason you, the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.]

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

[phone icon] **Questions or Comments** Call 1-800-225-2883 [or] [visit our website] [www.ortho.com]
[computer icon]

Manufactured for / Distributed for/by / Sold by:

The Ortho Group

P.O. Box 190

Marysville, OH 43040

[Product of / Made in U.S.A.]

[©XXXX] The Ortho Group, World rights reserved.

EPA Reg. No. 239-ETGN

EPA Est. No. xxxxxxx [Superscript is first letter of lot number]

BAIT STATION LABEL

[LABEL ON INDIVIDUAL BAIT STATION] *Note to PM: for products packaged in a station*

PRODUCT NAME

[For Indoor residential use]

ACTIVE INGREDIENT:

Hydramethylnon: 2.0%

OTHER INGREDIENTS: 98.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See outer carton for complete directions and precautionary statements.

Net Weight xx oz (xx g)

EPA Reg. No. 239-ETGN

[Superscript is first letter of lot number]

EPA Est. No. xxx. xxxx

[This side up/down]

[Push/Press/Snap] [here]

[Push/Press here] [to snap]

[Peel] [to open] [Optional Illustration]

[To open] [peel/tear] [here] [Optional Illustration]

[Fold/Attach/Hook/Tuck/Secure] [tab] [here] [Optional Illustration]

[Tear] [here] [to remove] [Optional Illustration]

[Date bait placed: /]

[Manufactured for / Distributed for/by / Sold by]

The Ortho Group

P.O. Box 190

Marysville, OH 43040]

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

[LABEL ON INDIVIDUAL BAIT] Note to PM: for products packaged in a syringe

PRODUCT NAME

[For Indoor residential use]

ACTIVE INGREDIENT:

Hydramethylnon 2.0%

OTHER INGREDIENTS: 98.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See outer carton for complete directions and precautionary statements.

Net Weight xx oz (xx g)

EPA Reg. No. 239-ETGN

EPA Est. No. xxx. Xxxx

[Superscript is first letter of lot number]

[phone icon] Questions or Comments Call 1-800-225-2883 or [visit our website] www.ortho.com

[computer icon]

[Manufactured for / Distributed for / Sold by

The Ortho Group

P.O. Box 190

Marysville, OH 43040]

Note to PM: For product packaged in a syringe, the following are optional dependent upon what will fit on the actual package.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through skin. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

FIRST AID
IF ON SKIN: <ul style="list-style-type: none"> Take off contaminated clothing Rinse skin immediately with plenty of water for 15-20 minutes Call poison control center or doctor for treatment advice
HOT LINE NUMBER
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1- 800-225-2883 for emergency assistance. Note to Physician: Emergency Information – call 1-800-225-2283

Physical and Chemical Hazards

Do not mix or allow to come in contact with an oxidizing agent. Hazardous reaction may occur.

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

MARKETING CLAIMS

Note to PM: For this table, any combination of approved claims from the master label may be inserted dependent upon sites listed on the market label and product size and packaging type (syringe vs station) Representation below. This table represents a "quick facts" section for the consumer. It is in addition to required label language (DFU, Storage Disposal, etc.)

[Brand] [Sub-Brand]	Ortho Roach Bait (or alternate brand name)
[Claims] [1.] [2.] [3.] [4.]	Kills roaches and the eggs they carry Remains edible for six months Guaranteed to work or your money back ^[†] Use in & around your home [insert approved claim(s) from master label]
[Product Facts:] [What it Does] [Where to Use/Apply] [When to use/Apply]	Product Facts: What it Does: Kills [all common] [the] [home infesting/invading] cockroaches you see and the ones/hundreds you don't [see]. Where to Use/Apply: [Use] indoors where roach activity is suspected or where they travel to find food, water or shelter. [e.g.,] [kitchens, bathrooms, basements, garages, porches]. When to Use/Apply: When roaches are present or roach activity is suspected

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

NOTE TO PM: THE FOLLOWING CLAIMS MAY OR MAY NOT APPEAR ON ANY LABEL OR IN ADVERTISING. APPROPRIATE FORMULA AND COMPANY SPECIFIC INFORMATION WILL BE INSERTED ON FINAL PRINTED LABEL TO REPLACE "X"

NOTE TO PM: COCKROACHES AND ROACHES MAY BE USED INTERCHANGEABLY

**CLAIMS FOR WHEN PACKAGED ONLY IN BAIT STATIONS
GENERAL PACKAGING CLAIMS**

1. [X] Easy to Use Stations
2. [X] No Mess Stations
3. [X] Ready to Use Stations
4. Easy/Simple Activation [Stations]

STATIONS WITH NO ACTIVATION REQUIRED

5. No touch activation!
6. No Activation [Needed] [Required]!

STATIONS USING SNAP ACTIVATION TECHNOLOGY

7. [Patented/Exclusive/Advanced] Clean Snap [Activation] [Technology]
8. [X] Clean Snap [Activation] [Technology] Stations
9. [Patented/Exclusive/Advanced] Simple Snap [Activation] [Technology]
10. [X] Simple Snap [Activation] [Technology] Stations
11. [Patented/Exclusive/Advanced] Easy Snap [Activation] [Technology]
12. [X] Easy Snap [Activation] [Technology] Stations
13. [Patented/Exclusive/Advanced] One-Snap [Activation] [Technology]
14. [X] One-Snap [Activation] [Technology] Stations
15. [Patented/Exclusive/Advanced] Snap [Activation] [Technology]
16. [X] Snap [Activation] [Technology] Stations
17. [One-handed] [Clean] [Simple] [Easy] Snap Activation
18. One-hand activation
19. Snap activation
20. Activates in a Snap!
21. It's a snap!

CLAIMS FOR ONLY WHEN PACKAGED IN A SYRINGE

22. For hard to reach cracks & crevices
23. [For] spot application/treatment/use
24. [For] crack & crevice application
25. [For] precision/precise [placement] [application]

GENERAL CLAIMS (applies to all packages)

26. Pre-filled [& Ready to Use]
27. No [Drips or] Spills
28. No Mess

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

29. Ready to Use
30. Continuous Action/Protection [Formula]* * for up to 3 months
31. Odorless Bait [Formulation]
32. Easy to Use
33. Effective Roach Control/Protection [for up to 3 months]
34. Keeps Working [for] up to [1,2,3] months
35. [Provide[s]] up to 3 Month[s] Protection/Control
36. Kills/Protects/Controls [for] up to 3 months
37. [Remains] palatable/edible/ to roaches for [at least] 6 months
38. [Bait] Palatable/Edible for [at least] 6 months
39. Kills/Controls Roaches
40. Kills/Controls roaches and/& the eggs they carry
41. Kills/Controls roaches and/& eggs
42. Kills/Controls all roach life stages
43. Kills/Controls adult/adult[s] [roaches] and nymphs
44. Kills/Controls roaches before you see them
45. Kills/Controls while you sleep
46. Kills/Controls [both] large and small roaches
47. Kills/Controls [all common] home invading cockroaches
48. [Helps] Protect[s] against [all common] home invading cockroaches
49. Kills/Controls [all common] home infesting cockroaches
50. [Helps] Protect[s] against [all common] home infesting cockroaches
51. Kills/Controls roaches where they live/hide/breed
52. Kills/Controls roaches at the source [of the infestation]
53. Kills/Controls roaches you see and roaches/those you don't [see]
54. Kills/Controls [the] roaches you see and the hundreds you don't [see]
55. Guaranteed [Kill] or your money back[†] [†][insert Ortho guarantee]
56. Guaranteed to work or your money back[†] [†][insert Ortho guarantee]
57. Long Lasting* [roach control] [protection] *for up to 3 months
58. [For] Use [with confidence] in kitchens & bathrooms / [Basements]/ [Garages]/[Laundry Rooms]/ [Porches]/[Terraces]/[Decks]/[Hardscapes]/[Gardens]
59. Use in/around your home
60. Helps protect against roach infestations
61. Kills [even] resistant[‡] [populations of] roaches [‡]pyrethroid and organophosphate resistant
62. Roaches share/spread bait for maximum kill[ing] [effectiveness][power]
63. Helps/makes one roach kill many more [roaches]
64. Roaches don't stand a chance

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

65. [Don't play roach roulette.] [Get] Guaranteed Results!

VALUE CLAIMS (applies to all packages)

66. Value Pack/Size[!]

67. Bonus Pack/Size[!]

68. Combo Pack[!]

69. WOW Pack[!]

70. [X%] More [Bait [Stations]]!

71. [X] Stations Free!

OPTIONAL GRAPHICS:

Picture of station denoting compartments and contents

Picture of roaches

Picture of bait station/syringe

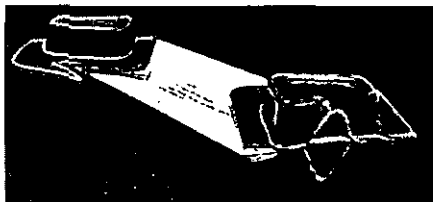
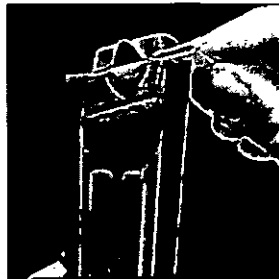
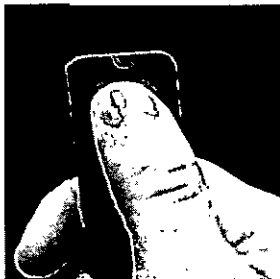
Pictures of bait station/syringe in use (kitchen, bathroom, basement, garage, porch, patio.) [illustration of bait station in use]

Pictures of where the bait can be used

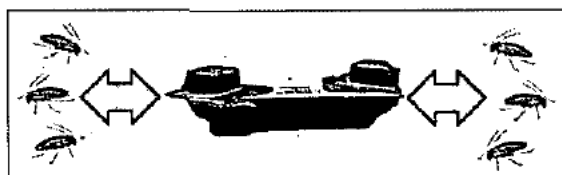
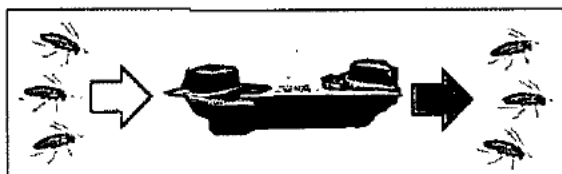
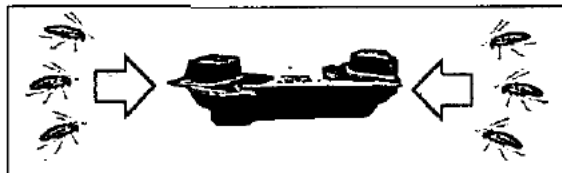
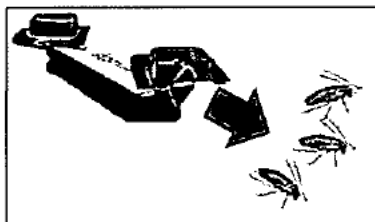
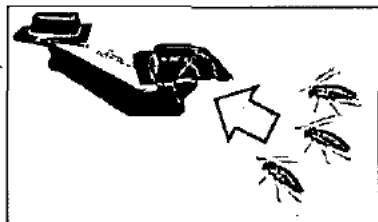
Pictures of how the bait works)

Pictures in Directions for use (removing from package, closing bait station, positioning station, etc.)

Representative Illustrations



Note to PM: ***Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.***





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 12, 2016

Jane Rothwell
Senior Analyst, Regulatory Affairs
14111 Scottslawn Road
Marysville, OH 43041

Subject: R310: New end use product
EPA File Symbol: 239-ETGN
Product Name: ORTHO ROACH BAIT
Application Dated: 06/01/2015
PRIA Due Date: 01/26/2016
Decision Number: 505692

Dear Ms. Rothwell:

The Agency has completed its review and assessment of your application pursuant to Section 33(b)(3) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) as amended by the Pesticide Registration Improvement Extension Act of 2012. The Agency has made a pre-decisional determination that your application cannot be approved unless revisions are made to the label. The necessary label changes were emailed to you on December 4, 2015 and January 12, 2016.

Since there is limited time before the PRIA Decision Due Date expires, it is important to discuss any objections you have to these changes immediately and whether you will need to submit additional data for review. If these discussions determine that submitting data will be necessary, the PRIA decision due date may need to be renegotiated to allow sufficient time to address and resolve such differences. If the PRIA Decision Due Date is not renegotiated, and the label issues are not resolved before the PRIA Decision Due Date, the Agency will send a follow-up letter that will represent the Agency's decision to close out the PRIA decision review time. The follow-up letter will provide the following three options for continuing the review of the application:

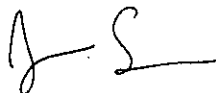
- (a) Applicant agrees to all of the terms associated with the draft accepted label as revised by the Agency and requests that it be issued as the accepted final Agency-stamped label; or
- (b) Applicant does not agree to one or more of the terms of the draft accepted label as revised by the Agency and requests additional time to resolve the difference(s); or
- (c) Applicant withdraws the application without prejudice for subsequent resubmission, but forfeits the associated registration service fee.

If the applicant informs EPA that it has concerns as described under (b) above, the applicant will have up to 30 calendar days from the date of that follow-up letter to reach agreement with the Agency on the final version of the label that the Agency will accept. If an agreement cannot be reached within those 30 days, EPA would intend to proceed with denial of the application.

If the applicant agrees to all of the terms of the accepted label as described in (a) above, or if the applicant and EPA resolve any differences as described in (b), the applicant must submit a revised label to EPA. EPA will then provide an accepted final Agency stamped label to the applicant within 2 business days following the applicant's written electronic confirmation of agreement to the Agency including the revised label to be stamped.

If you have any questions, please contact Elizabeth Fertich at fertich.elizabeth@epa.gov or (703) 347-0560.

Sincerely,



Jennifer Urbanski Saunders, Product Manager 4
Invertebrate & Vertebrate Branch 1 (IVB1)
Registration Division (7505P)
Office of Pesticide Programs

Fertich, Elizabeth

From: Fertich, Elizabeth
Sent: Tuesday, January 19, 2016 8:50 AM
To: 'Rothwell, Jane'
Cc: IVB1
Subject: RE: New product application: 239-ETGN

Hi Jane,
I checked with Jenn and she said it was fine to keep the claim as you proposed.
Kind regards,
Beth

Elizabeth Fertich
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)
fertich.elizabeth@epa.gov
703-347-8560

From: Rothwell, Jane [mailto:jane.rothwell@scotts.com]
Sent: Friday, January 15, 2016 10:39 AM
To: Fertich, Elizabeth <fertich.elizabeth@epa.gov>
Subject: Re: New product application: 239-ETGN

Great. I am heading to a meeting, but will re-send early afternoon.

Would you check on one more thing for me?

The claim "[For] Use [with confidence] in kitchens & bathrooms / [Basements]/ [Garages]/[Laundry Rooms]/ [Porches]/[Terraces]/[Decks]/[Hardscapes]/[Gardens]-

You struck - with confidence

We have that same claim approved on several Ortho labels. See example attached - page 8 in product facts.

On Fri, Jan 15, 2016 at 10:06 AM, Fertich, Elizabeth <fertich.elizabeth@epa.gov> wrote:

Hi Jane,

Thanks for letting me know about the errors. I haven't reviewed the label you sent yesterday yet.

Kind regards,

Beth

Elizabeth Fertich
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)

fertich.elizabeth@epa.gov
703-347-8560

From: Rothwell, Jane [mailto:jane.rothwell@scotts.com]
Sent: Friday, January 15, 2016 9:53 AM
To: Fertich, Elizabeth <fertich.elizabeth@epa.gov>
Subject: Re: New product application: 239-ETGN

Hi Beth

We found a couple of errors in this last version (misplaced brackets.. etc.)

I am trying to get fixed and will re send the final in pdf.

Let me know if you found anything I missed and I will fix that as well.

On Thu, Jan 14, 2016 at 4:23 PM, Rothwell, Jane <jane.rothwell@scotts.com> wrote:

Beth

Attached is the "final" label incorporating your comments and the few changes after the discussion with Jennifer Saunders. Please let me know if I missed anything!

Thank you,

Jane Rothwell

On Thu, Jan 14, 2016 at 1:48 PM, Fertich, Elizabeth <fertich.elizabeth@epa.gov> wrote:

Hi Jane,

Please see the attached label with our response to your comments and questions.

Kind regards,

Beth

Elizabeth Fertich
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)

fertich.elizabeth@epa.gov
703-347-8560

From: Fertich, Elizabeth
Sent: Wednesday, January 13, 2016 1:21 PM
To: 'Rothwell, Jane' <jane.rothwell@scotts.com>
Subject: RE: New product application: 239-ETGN

Yes, I'll be at my desk. Please give me a call at 2:00.

Thanks,

Beth

Elizabeth Fertich
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)

fertich.elizabeth@epa.gov
703-347-8560

From: Rothwell, Jane [<mailto:jane.rothwell@scotts.com>]
Sent: Wednesday, January 13, 2016 12:17 PM

To: Fertich, Elizabeth <fertich.elizabeth@epa.gov>
Subject: Re: New product application: 239-ETGN

Thank you.

I am making the changes you requested. I have a few questions on a few claims that I would like to discuss with you. Are you available this afternoon? Around 2?

On Wed, Jan 13, 2016 at 11:52 AM, Fertich, Elizabeth <fertich.elizabeth@epa.gov> wrote:

Jane,

I have added on additional comment to page 6 of the label. Please refer to this label for all comments and disregard the label I sent yesterday.

Thanks

Beth

Elizabeth Fertich
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)

fertich.elizabeth@epa.gov
703-347-8560

From: Fertich, Elizabeth
Sent: Tuesday, January 12, 2016 3:36 PM
To: 'Rothwell, Jane' <jane.rothwell@scotts.com>
Cc: IVB1 <IVB1@epa.gov>
Subject: RE: New product application: 239-ETGN

Jane,

Please see the attached label annotated with my comments and the pre-decisional letter. Please respond to confirm receipts of the label comments and letter.

Kind regards,

Beth

Elizabeth Fertich
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)

fertich.elizabeth@epa.gov
703-347-8560

From: Fertich, Elizabeth
Sent: Wednesday, January 06, 2016 8:54 AM
To: 'Rothwell, Jane' <jane.rothwell@scotts.com>
Subject: RE: New product application: 239-ETGN

Hi Jane,

I haven't finished reviewing your changes. I will contact you if I have any questions.

Kind regards,

Beth

Elizabeth Fertich
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)

fertich.elizabeth@epa.gov
703-347-8560

From: Rothwell, Jane [<mailto:jane.rothwell@scotts.com>]
Sent: Tuesday, January 05, 2016 3:16 PM
To: Fertich, Elizabeth <fertich.elizabeth@epa.gov>
Subject: Re: New product application: 239-ETGN

Fertich, Elizabeth

From: Rothwell, Jane <jane.rothwell@scotts.com>
Sent: Monday, December 21, 2015 2:06 PM
To: Fertich, Elizabeth; RDC Federal
Subject: Re: New product application: 239-ETGN
Attachments: EPA Response Updated label-cover letter and cited labels attached 20151221.pdf; 000239-ETGN.20151221.OrthoRoachBait.updatedversion.pdf

Follow Up Flag: Follow up
Due By: Monday, December 28, 2015 10:00 AM
Flag Status: Flagged

Good Afternoon Beth,

Attached is a cover letter and cited labels and a revised label for your review to support EPA File Symbol 239-ETGN. Based on the PRIA date of 1-26, I believe we will not have to re-negotiate the date.

Please review and let me know if there are any additional changes.

Thank you,

Jane Rothwell

(Please confirm you received this)

On Wed, Dec 16, 2015 at 1:02 PM, Fertich, Elizabeth <fertich.elizabeth@epa.gov> wrote:

Hi Jane,

I spoke with my PM and the efficacy reviewer about the items we discussed in our phone call earlier today. Their recommendation is to go through the label and make the necessary changes. While doing that highlight the claims that you think should be acceptable based on the additional cited label (64240-46) that was not included in the initial application. A formal rebuttal is not needed. Let me know if you have additional questions. Also, please let me know when you will be able to resubmit the label. This will aid in determining if a renegotiation will be necessary.

Kind regards,

Beth

Elizabeth Fertich
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)

fertich.elizabeth@epa.gov
703-347-8560

From: Rothwell, Jane [mailto:jane.rothwell@scotts.com]
Sent: Monday, December 07, 2015 4:17 PM
To: Fertich, Elizabeth <fertich.elizabeth@epa.gov>
Cc: Jim Wallace <james.wallace@scotts.com>; RDC Federal <regdoc@scotts.com>; IVB1 <IVB1@epa.gov>
Subject: Re: New product application: 239-ETGN

Beth

Thank you for the review. I will discuss with my R&D team when I return to work the end of the week and will call you to discuss (hopefully by Friday)

Thank you,

Jane Rothwell

On Mon, Dec 7, 2015 at 8:19 AM, Fertich, Elizabeth <fertich.elizabeth@epa.gov> wrote:

Jane,

Please see the attached efficacy review.

Kind regards,

Beth

Elizabeth Fertich
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)

fertich.elizabeth@epa.gov
703-347-8560

From: Fertich, Elizabeth
Sent: Friday, December 04, 2015 1:11 PM
To: 'Rothwell, Jane' <jane.rothwell@scotts.com>; Jim Wallace <james.wallace@scotts.com>; RDC Federal <regdoc@scotts.com>
Cc: IVB1 <IVB1@epa.gov>
Subject: RE: New product application: 239-ETGN

Jane,

I am waiting to hear from the efficacy reviewer on 2 items I need to clarify. I will send it to you on Monday.

Kind regards,

Beth

Elizabeth Fertich
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)

fertich.elizabeth@epa.gov
703-347-8560

From: Rothwell, Jane [<mailto:jane.rothwell@scotts.com>]
Sent: Friday, December 04, 2015 12:31 PM
To: Fertich, Elizabeth <fertich.elizabeth@epa.gov>; Jim Wallace <james.wallace@scotts.com>; RDC Federal <regdoc@scotts.com>
Cc: IVB1 <IVB1@epa.gov>
Subject: Re: New product application: 239-ETGN

Beth

I am heading out of town, and will return Thursday (heading to CSPA). I will may not be able to address this until then.

Would you please send me the efficacy review? We submitted a study to support claims- it appears at first glance they have all been struck. I would like to understand the rationale.

Kind regards,

Jane Rothwell

On Fri, Dec 4, 2015 at 11:20 AM, Fertich, Elizabeth <fertich.elizabeth@epa.gov> wrote:

Jane,

Please see the attached label annotated with my comments. Contact me if you have any questions.

Kind regards,

Beth

Elizabeth Fertich
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)

fertich.elizabeth@epa.gov
703-347-8560

--
Jane Rothwell

Senior Analyst, Regulatory Affairs

The Scotts Company LLC d/b/a The Ortho Group

p: 937-578-5984

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p: 937-578-5984



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

MEMORANDUM:

To: Beth Fertich

From: Eric Bohnenblust, Ph.D., Entomologist

Secondary Review: Kevin Sweeney, Senior Entomologist

Date: November 12, 2015

Subject: PRODUCT PERFORMANCE DATA EVALUATION RECORD (DER)

THIS DER CONTAINS CONFIDENTIAL BUSINESS INFORMATION

Note: MRIDs found to be unacceptable to support label claims should be removed from the data matrix.

DP barcode: 428002

Decision no.: 505692

Submission no: 969403

Action code: R310

Product Name: Ortho Roach Bait

EPA Reg. No or File Symbol: 239-ETGN

Formulation Type: bait/pressurized bait

Ingredients statement from the label with PC codes included:

Hydramethylnon 2.0 % PC: 118401

Application rate(s) of product and each active ingredient (lbs. or gallons/1000 square feet or per acre as appropriate; and g/m² or mg/cm² or mg/kg body weight as appropriate): 0.25 – 1 g/m²; depending on size of cockroach and density of infestation

Use Patterns: For cartridge packaging: use all bait stations. For syringe/pressurized bait: apply one 2-4" strip (or one to two pea-sized dabs) every three feet for small cockroaches, apply one 4" strip (or one to two dime-sized spots) every three feet for large cockroaches.

I. Action Requested: The registrant requested review of one study to support the following claims: Continuous killing action, starts killing in [less than 48] hours, starts killing fast, controls [nymph and adult] roaches in 7 days, controls [nymph and adult] roach infestation in [as few/little as] 7 days [1 week], kills adult/adult roaches and nymphs, starts working/to work upon feeding/at feeding/after feeding.

II. Background: The registrant is claiming substantial similarity of the proposed product to EPA Reg. No. [REDACTED] and citing all of the hydramethylnon efficacy data. In addition they are submitting one new study to request new claims against cockroaches.

III. MRID Summary:

49645802. Efficacy of a gel-bait formulation containing 2.0% hydramethylnon for use in an indoor bait station, against German cockroaches (*Blattella germanica*), both nymphs and adults.

Product ingredient source information may be entitled to confidential treatment

(1) non-GLP

(2) **Methods:** A 2.0% hydramethylnon cockroach bait formulation was fed to German cockroaches in 8.07" x 8.07" x 5.51" arenas. Approximately 1-2 g of bait (1-2 g/0.04 m²) was applied to filter paper or a bait station, and after one hour, 10 German cockroaches (unknown mixture of nymphs and adults) were placed in the test arenas. The cockroaches were provided with an apple slice (1/8th of an apple) for food in both treated and untreated arenas. Mortality was evaluated every 24 h until 90% mortality occurred in each bait treatment. Each treatment was replicated three times, and two separate experiments were performed, one with gel bait applied only to a filter paper, and one with bait applied to a filter paper, and another treatment with a bait station. Data were analyzed using Analysis of Variance and Student Newman-Keuls tests.

(3) **Results:** When filter paper was treated with hydramethylnon, mortality was significantly greater in the treated group at 3 days post application in one experiment and 4 days post application in the second experiment. When hydramethylnon was applied in a bait station, the mortality in the treated group was significantly greater than in the untreated group at 4 days post application. In the filter paper assays, 90% mortality of German cockroaches was reached at 7 days post application in both experiments. In the bait station assay 90% mortality was reached at 6 days post application. No mortality was observed in the control treatment during either experiment.

(4) **Conclusion: Unacceptable.** The study does not support efficacy claims for the proposed product because the rate tested is considerably higher than the label rate. In addition, the percentage of nymphs to adults is not provided, the nymph stage is not provided, light and dark cycle was not given, and it is not clear if a harborage was provided.

IV. EXECUTIVE DATA SUMMARY:

(A) The study submitted does not support any claims of product efficacy against German cockroaches or cockroaches.

V. LABEL RECOMMENDATIONS:

(1) Changes to the Directions for Use: Please see the attached label for directions that should be removed.

(2) The following marketing claims are acceptable for the product based on information/language contained in the approved label for [REDACTED]

Kills/Controls cockroaches

Kills/Controls German, brown-banded, American, smoky brown, or Oriental cockroaches

Kills cockroaches resistant to organophosphates, carbamates, and pyrethroids

(3) The following marketing claims are unacceptable:

Please see the attached label.

(4) The following MRIDs should be removed from the data matrix, because they are classified as "unacceptable" to support the product: 49645802

Product ingredient source information may be entitled to confidential treatment

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

Note to PM: This section for commercial use

ORTHO ROACH BAIT

RECOMMENDED FOR USE BY COMMERCIAL APPLICATORS

Syringe packaging is for use as a syringe or with other bait devices.

Cartridge packaging is for use with XACTADOSE[®] Precision Baiting System.

For Pressurized Bait System: The pressurized bait system package with the 4-inch extension tube is intended for precision baiting in a crack and crevice application.

FOR USE IN AND AROUND HOMES, COMMERCIAL, INDUSTRIAL, OR INSTITUTIONAL AREAS

ACTIVE INGREDIENT:

Hydramethylinon

[tetrahydro-5,5-dimethyl-2(1H)-pyrimidinone(3-[4-(trifluoromethyl)phenyl]-1-(2-[4-(trifluoromethyl)phenyl]ethenyl)-2-propenylidene)hydrazone]2.0%

OTHER INGREDIENTS:..... 98.0%
TOTAL: 100.00%

Keep out of reach of children.

CAUTION

See back panel for additional First Aid, Precautionary Statements and Directions for Use

Use Only in Areas Not Easily Accessible to Children and Pets

Net weight xxxxxxxxxx

FIRST AID [icon]

HAVE LABEL WITH YOU WHEN OBTAINING TREATMENT ADVICE
IF SWALLOWED:

- Call a poison control center, doctor, or 1-800-225-2883 immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.

Hot line number: Have the product container or label with you when calling a poison control center or doctor or going for treatment. In case of emergency, call day or night 800-225-2883.

Note to PM: Bold Italicized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: May be harmful if swallowed. Avoid contact with skin and clothing. Wash hands thoroughly after handling.

For Pressurized Bait System:

PHYSICAL AND CHEMICAL HAZARDS

Contents under pressure. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ THIS LABEL: Read this entire label and follow all use directions and use precautions. Use only for the sites, pests and application methods described on this label.

Do not apply this product in a way that will contact any person or pet.

[Insert Product name] may be used as a spot or crack and crevice treatment for the control of cockroaches (including carbamate, organophosphate and pyrethroid resistant strains) in and around homes and the non-food/feed areas of institutional, warehousing and commercial establishments (such as groceries and supermarkets; meat, poultry and shell egg grading plants; hotels and motels; hospitals and nursing homes; schools; laboratories; computer facilities; sewers; buses, boats, ships, trains, and planes; pet shops; and zoos). Nonfood areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries, and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

[Insert Product name] may be used only as a crack and crevice treatment in food/feed areas of restaurants and other commercial or institutional food handling establishments, and food manufacturing, processing, storage and warehousing facilities. Food areas include areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups) and distribution facilities. Serving areas (when food is exposed and facility is in operation) are also considered food areas. Serving areas are areas where prepared foods are served, such as dining rooms, but excluding areas where foods may be prepared or held.

APPLICATIONS OF THIS PRODUCT IN THE FOOD/FEED AREAS OF FOOD/FEED-HANDLING ESTABLISHMENTS OTHER THAN AS A CRACK AND CREVICE TREATMENT ARE NOT PERMITTED.

Keep exposed gel away from open food and food contact surfaces. Do not place treatments in locations where routine cleansing operations may transfer diluted bait to food or food preparation surfaces. Do not apply gel to areas where food, food utensils or food processing/food preparation surfaces may become contaminated. Do not apply to areas that are routinely washed such as: cracks and crevices in tops of tables, food preparation, and prepared food holding surfaces, as gel may be removed by washing. Do not apply to surfaces where the temperature exceeds 130°F. Examples include, but are not limited to, portions of stoves, ovens, grills, fume hoods, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers and hot water pipes. Care should be taken to avoid depositing gel onto exposed surfaces. If gel contacts an exposed surface, remove gel and wash exposed surface promptly. Do not apply gel to areas which have been recently sprayed with insecticide, and do not spray insecticide over gel as it may cause the bait to become repellent.

Application rate is dependent on level of infestation and species to be controlled. Numerous smaller placements will provide faster control than few larger spots, especially for German cockroach control. Pest population reduction will be apparent within a week or less.

Cockroaches become lethargic after ingesting the bait and some may be seen during daylight hours.

Note to PM: Bold Italicized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

For Syringe or Cartridge:

Cockroach Species	Application Rate (g/m ² infested)	Application Method
Small, such as German or brown-banded	0.25 - 0.50	Thin film or small spots
Large, such as American, smoky-brown or Oriental	0.5 - 1.0	Larger spots

For Pressurized Bait System:

Pressurized Bait System Application Rate: For low to moderate infestations of cockroaches, place 6-12 bait points per square meter. For heavy infestations of cockroaches, 12-24 bait points per square meter. The PRESSURIZED BAIT SYSTEM is approximately 0.04 grams per spot and occupies an area about 3 mm of space.

Cockroach Species		Application Rate (g/m ² infested)	Application Method
Small, such as German or brown-banded	Low to moderate infestation 0.24-0.50	Heavy infestation 0.5-1.0	Thin film or small spots
Large, such as American, smoky-brown or Oriental	0.5 - 1.0		Larger spots

The lower application rate should be used for low to moderate infestations and the higher rate for more severe infestations. Gel placements should be at or near harborage or aggregation areas, such as cracks and crevices, corners, or areas of movement.

Outdoor Use Directions: For use outdoors to control smokybrown, American, oriental, woods, and other outdoor cockroach species. Apply bait to likely points of entry or harborage sites, such as: the cracks and crevices around windows, doors, porches, sills and screens; holes where pipes or utilities enter a structure; expansion joints; beneath siding or shingles; around firewood piles; eaves; attic or soffit vents; weep holes in masonry; and similar sites. Also, apply bait in likely breeding areas, such as tree holes, behind palm fronds, basements, crawlspaces, attics, garages, or similar sites.

Priority treatment areas may be identified by visual inspection of such areas listed above or aided by trapping techniques or spot flushings.

For Syringe or Cartridge"

To apply gel, remove the cap on nozzle, touch the application tip to surface, and apply. Recapping the application tip after treatment is completed is recommended to preserve bait freshness. The bait will adhere to non-greasy or non-dusty surfaces and will remain palatable to cockroaches for at least 6 months. Repeat treatments as necessary to maintain adequate control.

For Pressurized Bait System: To apply gel, remove the cap on nozzle, touch the application tip to surface and apply. The bait will adhere to non-greasy or non-dusty surfaces and will remain palatable to cockroaches for at least 6 months. Repeat treatments as necessary to maintain adequate control.

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

For syringe or cartridge:

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Wrap used cartridge and place in a trash can.

For pressurized Bait System:

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in a cool, dry area away from heat or open flame.

DISPOSAL: This container may be recycled in the few but growing number of communities where steel aerosol can recycling is available. Before offering for recycling, empty the can by using the product according to the label. **DO NOT PUNCTURE OR INCINERATE!** If recycling is not available, wrap the container and discard in trash.

[Ortho [or insert sub-registrant company name] **Guarantee:** If for any reason you, the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.

[phone icon] **Questions or Comments** Call 1-800-225-2883 or [visit our website] www.ortho.com [computer icon]

[Ortho & Your Environment:] [Your home is a place for family and pets to enjoy.] [That's why ORTHO® products are designed with care to provide effective solutions to insect problems inside your home.] [For best results, please follow instructions for appropriate usage, storage and disposal.]

Manufactured for / Distributed For / Sold by:

The Ortho Group

P.O. Box 190

Marysville, OH 43040

[Product of / Made in U.S.A.]

©XXXX The Ortho Group, World Rights Reserved.

EPA Reg. No. 239-NEW

EPA Est. No.

[Superscript is first letter of lot number]

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

Note to PM: This Section for Consumer products packaged in a syringe or bait station

OUTER PACKAGE - COMPLETE LABEL

Alternate Brand Names:

Ortho Roach Bait Gel
Ortho Roach Killer Bait
Ortho Roach Killer Gel

Ortho Home Defense Roach Bait
Ortho Home Defense Roach Bait Gel
Ortho Home Defense Roach Killer Bait
Ortho Home Defense Roach Killer Gel

Ortho Home Defense MAX Roach Bait
Ortho Home Defense MAX Roach Bait Gel
Ortho Home Defense MAX Roach Killer Bait
Ortho Home Defense MAX Roach Killer Gel

Ortho Roach B Gon Roach Bait
Ortho Roach B Gon Roach Bait Gel
Ortho Roach B Gon Roach Killer Bait
Ortho Roach B Gon Roach Killer Gel

For Indoor residential use

ORTHO ROACH BAIT

ACTIVE INGREDIENT:

Hydramethylnon..... 2.0%

OTHER INGREDIENTS:98.0%
TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

Refer to/see back/side panel[s] for additional Precautionary Statements, First Aid and Directions for Use.

Contains xx [xx oz (g)] Bait Stations
Total Net Contents xx oz (xx g)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: May be harmful if swallowed. Avoid contact with skin and clothing. Wash hands thoroughly after handling.

Note to PM: Bold Italicized text is information for the reader and not part of the label. [Bracketed information is optional.] Text separated by / denotes and/or options.

FIRST AID
<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
HOT LINE NUMBER
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1- 800-225-2883 for emergency assistance.</p> <p>Note to Physician: Emergency Information – call 1-800-225-2283.</p>

Note to pm- for product packaged in a Station

[The ORTHO Advantage] [Why/About Ortho [product name]] [How We Work] [How it Works]

~~[Ortho starts killing roaches in with a snap] [...no, really!]~~ It all starts with our [patented/exclusive/advanced] [Clean/Easy/Simple/One-] Snap [Activation] [Technology] bait stations. When you hear that satisfying *snap*, the station is ready for action. Inside the station is a ~~carefully-crafted cocktail/blend/mix/formula/bait~~ [of/with food, water and *just enough hard stuff to do the job [right]*]. ~~[It's the perfect snack for unsuspecting roaches scavenging for their next score.]~~ Once we've lured roaches ~~[in] to the bait [station]~~, our work is done. ~~Roaches naturally do the rest, spreading the bait to kill the [many] [other] roaches hiding in cracks and behind walls. [Remember that for every roach you see, there are hundreds you don't!]~~

[Did you know: One visible roach typically means hundreds more are hiding?

That's where [product name] can help. ~~It contains both food and water sources to draw roaches into the station. Roaches enter the station and eat the bait. When they leave, their natural behavior spreads the bait, killing the many other roaches hiding in cracks, crevices and behind walls.]~~

Note to pm- for product packaged in a Syringe

[The ORTHO Advantage] [Why/About Ortho [product name]] [How We Work] [How it Works]

~~[Ortho helps you reclaim your home from roaches with a potent mix of precision and power.]~~ It all starts with the syringe, ideal for stealth/discreet placements ~~[sure]~~ to draw/stir roaches out of/from ~~[their] hiding [places]~~. Inside each syringe is a ~~carefully-crafted cocktail/blend/mix/formula/bait~~ [of/with food, water and *just enough hard stuff to do the job [right]*]. ~~[It's the perfect snack for unsuspecting roaches scavenging for their next score.]~~ Once we've lured roaches to the bait, our work is done. ~~Roaches naturally do the rest, spreading the bait to kill the [many] [other] roaches hiding in cracks and behind walls. [Remember that for every roach you see, there are hundreds you don't!]~~

[Did you know: One visible roach typically means hundreds more are hiding?

That's where [product name] can help. ~~It contains both food and water sources to draw roaches to the bait. Roaches eat the bait and their natural behavior spreads the bait, killing the [many] other roaches hiding in cracks, crevices and behind walls.]~~

Note to PM- For product packaged in a Syringe or Bait Station

[HOW xx /product name WORKS]

- ~~[xx/product name contains food and water sources to attract roaches.]~~
- ~~[Roaches enter the station, eat the bait, then crawl away to die.]~~
- ~~[Natural roach behavior spreads the bait to kill other roaches.]~~

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

READ ENTIRE LABEL. Use strictly in accordance with Precautionary Statements and Directions. Use bait only in areas inaccessible to children and pets.

Use Restrictions

Note to PM: Bold Italicized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

- Do not use near food preparation surfaces
- Do not place bait near areas of excessive heat. [Examples include, but are not limited to: [portions of] stoves, ovens, grills, toasters, and dishwashers.]

Note to PM- For product packaged in a station

[1.] WHEN TO USE/APPLY: When roaches are present or [roach activity is] suspected.

[2.] WHERE TO USE/APPLY: Indoors where roaches are suspected or where they travel to find food, water or shelter. [[e.g.,] Kitchens/ Bathrooms/ Basements/ Garages/Laundry Rooms/ Porches/Terraces/Decks/Hardscapes.] [Common areas include: along baseboards, in corners of rooms and cabinets, under and behind appliances, under sinks, in pantry, on window sills, around doorways, [and] near garbage cans.]

Note to PM: optional illustrations may be used in conjunction with these steps.

[3.] HOW TO USE/APPLY: Note to PM: Dependent upon station design used, one or more of the these options will be on market label.

1. [Open carton and] Remove bait stations [from package/pouch]. [Optional Illustration]

2. [Separate stations [along perforation].

3. **[Option #1]**

[Open/Activate stations by peeling off label(s)/sticker(s)/film/strip to expose the bait inside.] [Optional Illustration]

[Option #2]

[To open/activate [the Clean/Easy/Simple/One- Snap] stations, snap open the end[s] [to expose bait inside].] [Tuck/fold/hook the slit[s]/notch[es]/end flange[s]/hook[s] [around the [station's] outer edge] to hold back/secure [the] [Clean/Easy/Simple/One- Snap] tab[s]] [Optional Illustration]

[Option #3]

[Open/Activate stations by cutting along line/perforation/seam to expose bait inside.] [Optional Illustrations]

4. [Peel label off adhesive sticker on the back of the station.] [Optional Illustration]

5. [Place [the] station(s) [[with] THIS SIDE UP [facing upward]] in [out-of-the-way locations in] [the] area(s) [that] you have been experiencing or suspect roach activity.] [Optional Illustration]

6. [Replace the bait stations every 6 months, or sooner for heavy roach infestations.]

[4.] AMOUNT TO USE/APPLY:

For best results, use all [X] stations included in the package. [Additional stations may be needed to control heavy infestations.]

[5.] WHEN TO REAPPLY: [Monitor regularly and] repeat treatments as necessary to maintain adequate control. [The bait will remain attractive to cockroaches for at least 6 months.]

Note to PM- For product packaged in a Syringe

[1.] WHEN TO USE/APPLY: When roaches are present or [roach activity is] suspected.

[2.] WHERE TO USE/APPLY: Indoors along cracks and crevices where roaches are suspected or where they travel to find food, water or shelter. [[e.g.,] Kitchens/ Bathrooms/ Basements/ Garages/Laundry Rooms/ Porches/Terraces/Decks/Hardscapes.] [Common areas include: along baseboards, in corners of rooms and cabinets, under and behind appliances, under sinks, in pantry, on window sills, around doorways, [and] near garbage cans.]

[3.] HOW TO USE/APPLY: To apply, remove the cap on [the] nozzle, touch the application tip to the intended/desired surface, and apply in small dabs or lines across cracks and crevices. Recap the application tip after treatment is complete to preserve bait freshness.

[4.] AMOUNT TO USE/APPLY: For small roaches, [such as German or brown-banded,] apply one 2" - 4" strip of bait or one to two pea-sized dabs of bait every three feet in infested areas. For large roaches, [such as American, Oriental or smoky-brown], apply one to two 4" strips of bait or one to two dime-sized spots of bait every three feet in infested areas.

[5.] WHEN TO REAPPLY: [Monitor regularly and] repeat treatments as necessary to maintain adequate control.

Note to PM: Bold Italicized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

[The bait will remain attractive to cockroaches for at least 6 months.]

Note to PM- For product packaged in a Syringe or Bait Station

[Optional]

[HELPFUL TIPS:]

- [Do not place bait stations in areas that have been recently sprayed with insecticide as this may reduce effectiveness.]
- [For heavy infestations, additional bait [stations] may be required.]
- [Monitor [bait] [stations] regularly for activity.]
- ~~[[Once the [immediate] roach problem has been controlled,] use [Ortho Home Defense for Indoor & Perimeter, **Note to PM: EPA REG: 239-2718** [product name] for [long-lasting] [control of] [protection against] roaches [and] [many] [other] [home-invading] [insects].]~~
- ~~[[Once the [immediate] roach problem has been controlled,] use [Ortho Home Defense for Indoor & Perimeter, **Note to PM: EPA REG: 239-2718** [product name] to create a [long-lasting] [protective] barrier against roaches [and] [many] [other] [home-invading] [insects].]~~

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep out of reach of children and animals. Store in original pouch/package/container only. Store in a clean, dry, well ventilated place and avoid excess heat.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling, if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Note to PM- Warranty/Guarantee or notice statements may or may not appear on market label and will be company specific

[Ortho & Your Environment:] [Your home is a place for family and pets to enjoy.] [That's why ORTHO® products are designed with care to provide effective solutions to insect problems inside your home.] [For best results, please follow instructions for appropriate usage, storage and disposal.]

[ICON] [People and pets can enter/use the area while stations are in use]

Note to PM - Guarantee & Notice statements may or may not appear on market label

[Notice: To the extent consistent with applicable law, buyer assumes all risks of use, storage or handling of this product not in accordance with directions.]

[The Ortho [or insert sub-registrant company name] [Guarantee: If for any reason you, the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.]

[phone icon] **Questions or Comments** Call 1-800-225-2883 [or] [visit our website] [www.ortho.com] [computer icon]

Manufactured for / Distributed for/by / Sold by:
The Ortho Group
P.O. Box 190
Marysville, OH 43040

[Product of / Made in U.S.A.]

©XXXX The Ortho Group, World rights reserved.

EPA Reg. No. 239-NEW

EPA Est. No. xxxxxxxx [Superscript is first letter of lot number]

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

BAIT STATION LABEL

[LABEL ON INDIVIDUAL BAIT STATION] Note to PM: for products packaged in a station

PRODUCT NAME

[For Indoor residential use]

ACTIVE INGREDIENT:

Hydramethylnon.....2.0%

OTHER INGREDIENTS:

98.0%
TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See outer carton for complete directions and precautionary statements.

Net Contents xx oz (xx g)

EPA Reg. No. 239-NEW

EPA Est. No. xxx. xxxx

[Superscript is first letter of lot number]

[This side down]

[Date bait placed: /]

[Manufactured for / Distributed for/by / Sold by

The Ortho Group

P.O. Box 190

Marysville, OH 43040]

Note to PM: **Bold Italicized text** is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

[LABEL ON INDIVIDUAL BAIT] **Note to PM: for products packaged in a syringe**

PRODUCT NAME

[For Indoor residential use]

ACTIVE INGREDIENT:

Hydramethylinon.....2.0%

OTHER INGREDIENTS:

98.0%
TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See outer carton for complete directions and precautionary statements.

Net Contents xx oz (xx g)

EPA Reg. No. 239-NEW

EPA Est. No. xxx. Xxxx

[Superscript is first letter of lot number]

[phone icon] Questions or Comments Call 1-800-225-2883 or [visit our website] www.ortho.com

[computer icon]

[Manufactured for / Distributed for / Sold by

The Ortho Group

P.O. Box 190

Marysville, OH 43040]

Note to PM: For product packaged in a syringe, the following are optional dependent upon what will fit on the actual package.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: May be harmful if swallowed. Avoid contact with skin and clothing. Wash hands thoroughly after handling

FIRST AID
<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
HOT LINE NUMBER
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-225-2883 for emergency assistance.</p> <p>Note to Physician: Emergency Information – call 1-800-225-2283</p>

Note to PM: ***Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.***

Note to PM: Any combination of approved claims from the master label may be inserted dependent upon sites listed on the market label and product size and packaging type (syringe vs station) Representation below.

[Brand] [Sub-Brand]	Ortho Roach Bait (or alternate brand name)
[Claims] 1. 2- 3- 4- 5-	Kills roaches and the eggs they carry Keeps killing for up to 6 months Starts working fast Guaranteed to work * [or your money-back] Use [with confidence] in & around your home [insert approved claim(s) from master label]
[Product Facts:] [What it Does] [Where to Use/Apply] [When to use/Apply]	Product Facts: What it Does: Kills [all common] [the] [home infesting/invading] cockroaches you see and the ones/hundreds you don't [see] . Where to Use: [Use] indoors where roach activity is suspected or where they travel to find food, water or shelter. [e.g.,] [kitchens, bathrooms, basements, garages, porches]. When to Use: When roaches are present or roach activity is suspected

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

NOTE TO PM: THE FOLLOWING CLAIMS MAY OR MAY NOT APPEAR ON ANY LABEL OR IN ADVERTISING. APPROPRIATE FORMULA AND COMPANY SPECIFIC INFORMATION WILL BE INSERTED ON FINAL PRINTED LABEL TO REPLACE "X"

NOTE TO PM: COCKROACHES AND ROACHES MAY BE USED INTERCHANGEABLY

CLAIMS FOR WHEN PACKAGED ONLY IN BAIT STATIONS

GENERAL PACKAGING CLAIMS

1. [X] Easy to Use Stations
2. [X] No Mess Stations
3. [X] Ready to Use Stations
4. Easy/Simple Activation [Stations]

STATIONS WITH NO ACTIVATION REQUIRED

5. No touch activation!
6. No Activation [Needed] [Required]!

STATIONS USING SNAP ACTIVATION TECHNOLOGY

7. [Patented/Exclusive/Advanced] Clean Snap [Activation] [Technology]
8. [X] Clean Snap [Activation] [Technology] Stations
9. [Patented/Exclusive/Advanced] Simple Snap [Activation] [Technology]
10. [X] Simple Snap [Activation] [Technology] Stations
11. [Patented/Exclusive/Advanced] Easy Snap [Activation] [Technology]
12. [X] Easy Snap [Activation] [Technology] Stations
13. [Patented/Exclusive/Advanced] One-Snap [Activation] [Technology]
14. [X] One-Snap [Activation] [Technology] Stations
15. [Patented/Exclusive/Advanced] Snap [Activation] [Technology]
16. [X] Snap [Activation] [Technology] Stations
17. [One-handed] [Clean] [Simple] [Easy] Snap Activation
18. One-hand activation
19. Snap activation
20. Activates in a Snap!

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

- 21. It's a snap!
- 22. ~~Clean on You. Mean on Roaches.~~
- 23. ~~Glean Activation. Mean Elimination.~~
- 24. ~~Activate. Eliminate. Celebrate.~~

CLAIMS FOR ONLY WHEN PACKAGED IN A SYRINGE

- 25. ~~For hard to reach places [such as cracks & crevices]~~
- 26. [For] spot application/treatment/use
- 27. [For] crack & crevice application
- 28. [For] precision/precise [placement] [application]
- 29. ~~Discreet/Stealth roach control~~

GENERAL CLAIMS (applies to all packages)

- 30. Pre-filled [& Ready to Use]
- 31. No [Drips or] Spills
- 32. No Mess
- 33. Ready to Use
- 34. ~~Continuous Action/Protection [Formula]~~
- 35. Odorless Bait [Formulation]
- 36. Easy to Use
- 37. ~~Effective Roach Control/Protection [for up to] [6 months]~~
- 38. ~~Lasts/Keeps Working for [up to] [1,2...6] months~~
- 39. [Provides] [Up to] 6 Month[s] Protection/Control
- 40. Kills/Protects/Controls [for] [up to] 6 months
- 41. Kills/Destroys/Eliminates/Controls Roaches {Fast}
- 42. ~~Kills/Destroys/Eliminates/Controls roaches and the eggs they carry~~
- 43. ~~Kills/Destroys/Eliminates/Controls generations of roaches~~
- 44. ~~Kills/Destroys/Eliminates/Controls multiple generations of roaches~~
- 45. ~~[A] multi-generation roach killer~~
- 46. ~~Kills/Destroys/Eliminates/Controls roaches across generations~~
- 47. ~~Kills/Destroys/Eliminates/Controls roaches across life stages~~
- 48. ~~Kills/Destroys/Eliminates/Controls adult/adult[s] [roaches] and nymphs~~
- 49. ~~Kills/Destroys/Eliminates/Controls roaches before you see them~~
- 50. ~~Kills/Destroys/Eliminates/Controls while you sleep~~

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

51. Fast Acting [Formula]
52. Starts killing in [less than] [48] hours
53. Starts killing in [less than] 2 days
54. [Visible] results in [less than] [48] hours
55. [Visible] results in [less than] 2 days
56. Starts killing fast
57. Starts working immediately [upon/at/after feeding]
58. Starts to work immediately [upon/at/after feeding]
59. Starts working fast
60. Kills fast, kills many
61. [Fast Acting] [Long Lasting] [Roach Control]
62. Controls/Stops/Eliminates roaches in 7 days/1 week
63. Controls/Stops/Eliminates [roach] infestation(s) in [as few/little as] 7 days/1 week
64. Kills/Destroys/Eliminates/Controls [both] large and small roaches
65. Kills/Destroys/Eliminates/Controls [all common] home invading cockroaches
66. Protects against [all common] home invading cockroaches
67. Kills/Destroys/Eliminates/Controls [all common] home infesting cockroaches
68. Protects against [all common] home infesting cockroaches
69. Kills/Destroys/Eliminates/Controls roaches where they live/hide/breed
70. Kills/Destroys/Eliminates/Controls roaches at the source [of the infestation]
71. Kills/Destroys/Eliminates/Controls roaches you see and roaches/those you don't [see]
72. Kills/Destroys/Eliminates/Controls [the] roaches you see and the hundreds you don't [see]
73. Guaranteed* [Kill] [or your money back] *[insert Ortho guarantee]
74. Guaranteed to work* [or your money back] *[insert Ortho guarantee]
75. Kills/Destroys/Eliminates roaches where they hide/live/breed & and controls/eliminates infestations in [as little as] 7 days/1 week[!]
76. Kills/Destroys/Eliminates roaches where they hide/live/breed to control/eliminate infestations in [as little as] 7 days/1 week[!]
77. Starts killing/working fast & controls/eliminates infestations in [as little as] 7 days/1 week[!]
78. Kills/Destroys/Eliminates/ roaches at the source to control/eliminate roach infestations in [as little as] 7 days/1 week[!]
79. Advanced Bait Technology
80. Advanced Bait Formula

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

81. Attracts ~~[roaches]~~ fast and kills ~~[roaches]~~ fast
82. Attracts and kills/destroys/eliminates/controls roaches throughout your house/home* when used according to package directions.
83. Long-Lasting ~~[roach control]~~ ~~[protection]~~
84. Use ~~[Ortho Home Defense Insect Killer for Indoor & Perimeter, **Note to PM: EPA REG: 239-2718**]~~ ~~[product name]~~ for ~~[long lasting]~~ ~~[control of]~~ ~~[protection against]~~ roaches ~~[and]~~ ~~[many]~~ ~~[other]~~ ~~[home invading]~~ ~~[insects]~~.
85. Use ~~[Ortho Home Defense Insect Killer for Indoor & Perimeter, **Note to PM: EPA REG: 239-2718**]~~ ~~[product name]~~ to create a ~~[long lasting]~~ ~~[protective]~~ barrier against roaches ~~[and]~~ ~~[many]~~ ~~[other]~~ ~~[home invading]~~ ~~[insects]~~.
86. ~~[For]~~ Use ~~[with confidence]~~ in kitchens & bathrooms / ~~[Basements]~~/ ~~[Garages]~~/~~[Laundry Rooms]~~/~~[Porches]~~/~~[Terraces]~~/~~[Decks]~~/~~[Hardscapes]~~/~~[Gardens]~~
87. ~~[Helps]~~ keep roaches from coming back
88. ~~[Helps]~~ protect against roaches coming back
89. ~~[Helps]~~ protect against roach infestations
90. Strong enough for urban roach~~[es]~~ ~~[populations]~~ ~~[infestations]~~
91. Strong enough for Southern roach~~[es]~~ ~~[populations]~~ ~~[infestations]~~
92. Strong enough for ~~[Urban &/and Southern]~~ ~~[Southern &/and Urban]~~ roach~~[es]~~ ~~[populations]~~ ~~[infestations]~~
93. Kills/Destroys/Eliminates/Controls ~~[even]~~ urban roach~~[es]~~ ~~[populations]~~ ~~[infestations]~~
94. Kills/Destroys/Eliminates/Controls ~~[even]~~ Southern roach~~[es]~~ ~~[populations]~~ ~~[infestations]~~
95. Kills/Destroys/Eliminates/Controls ~~[even]~~ ~~[Urban &/and Southern]~~ ~~[Southern &/and Urban]~~ roach~~[es]~~ ~~[populations]~~ ~~[infestations]~~
96. Kills ~~[even]~~ the toughest roaches
97. Works on hard to kill roaches
98. Kills ~~[even]~~ resistant ~~[populations of]~~ roaches
99. Roaches share/spread bait for maximum kill~~[ing]~~ ~~[effectiveness]~~ ~~[power]~~
100. Roaches share/spread bait for exponential kill~~[ing]~~ ~~[effectiveness]~~ ~~[power]~~
101. ~~[Guaranteed to]~~ start~~[s]~~/initiate~~[s]~~ the ~~[roach]~~ death cycle
102. Start~~[s]~~/Initiate~~[s]~~ the ~~[ant]~~ death cycle ~~[guaranteed]~~
103. Helps/makes one roach kill many more ~~[roaches]~~
104. Roaches don't stand a chance
105. ~~[Don't play roach roulette.]~~ ~~[Get]~~ Guaranteed Results!
106. Kitchen and/ & bathroom approved ~~[roach control]~~
107. Kitchen and/ & bathroom friendly ~~[roach control]~~
108. The Mean & Clean Way to Kill/Destroy/Eliminate/Control Roaches

VALUE CLAIMS (applies to all packages)

109. Value Pack/Size~~[!]~~
110. Bonus Pack/Size~~[!]~~
111. Combo Pack~~[!]~~
112. WOW Pack~~[!]~~
113. ~~[X%]~~ More ~~[Bait]~~ ~~[Stations]~~!
114. ~~[X]~~ Stations Free!

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

OPTIONAL GRAPHICS:

Picture of station denoting compartments and contents

Picture of roaches

Picture of bait station/syringe

Pictures of bait station/syringe in use (kitchen, bathroom, basement, garage, porch, patio.) [illustration of bait station in use]

Pictures of where the bait can be used

Pictures of how the bait works

Pictures in Directions for use (removing from package, closing bait station, positioning station, etc.)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEE

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

DOCUMENT CONTAINS CONFIDENTIAL INFORMATION

DP BAR CODE NO.: 428102
PC Code: 118401
FOOD Use: No

EPA File Symbol NO.: 239-ETGN
ACTION CODE: R310

DECISION NO.: 505692

DATE OUT: 09/17/2015

SUBJECT: End Use Product Chemistry Review
Product Name: Ortho Roach Bait

FROM: Hari Mukhoty, DVM, PhD.
Product Chemistry Team
Technical Review Branch / Registration Division (7505P)

TO: Elizabeth Fertich, RMR / Jennifer Urbanski, RM 04
Invertebrate & vertebrate Branch 3 / Registration Division (7505P)

Company Name: The Scotts Company
Formulation Type: Not Provided

INTRODUCTION:

The registrant has submitted a basic CSF (Dated: 04/21/2015) for registration of the aforesaid product under EPA File Symbol No. 239-ETGN.

The proposed product (Gel Insecticide) is a 100% re-pack of EPA Reg. No. [REDACTED]

The aforesaid basic end-use product is manufactured by The Scotts Company, Ohio, USA.

CITAB has been requested to evaluate the product chemistry data required for registration of the proposed formulation.

SUMMARY OF FINDINGS:

1. Name of Active Ingredient(s): Hydramethylnon (2.0%).
2. Has the registrant claimed substantial similarity to registered product?
[X] Yes [] No [] NA If yes: EPA Reg. No. [REDACTED]
3. The source material of the active ingredient is registered with the Agency [Yes].
4. The CSF has been screened by inert group and they found that inerts are approved for non-food/feed use.

DP BAR CODE NO.: 428102
PC Code: 118401
FOOD Use: No

EPA File Symbol NO.: 239-ETGN
ACTION CODE: R310

DECISION NO.: 505692

5. Confidential Statement of Formula(s):

☒ Basic - Dated: 04/21/2015 Re-submitted: NA
☐ Alternate - Dated: Re-submitted: NA

Alternate CSF(s) complies with 40CFR §152.43: ☐ Yes ☐ No NA ☒

6. Product label

a. Ingredient statement: Nominal concentrations of AI listed on CSF(s) concur with product label (PR Notice 91-2).

☒ Yes

Is the sub statement in compliance with PR Notice 97-6?

☒ Yes ☐ No - Uses the term "Other Ingredients"
if not, explain below:

Metallic equivalent: ☐ Yes ☒ NA
Soluble arsenic: ☐ Yes ☒ NA
Isomeric ratios: ☐ Yes ☒ NA
Acid equivalent: ☐ Yes ☒ NA

b. Health related sub statements:

Petroleum distillate at > 10%: ☐ Yes ☐ No ☒ NA
Methanol at > 4%: ☐ Yes ☐ No ☒ NA
Sodium Nitrate / Sodium Nitrite ☐ Yes ☐ No ☒ NA

c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

☒ Yes ☐ No Contents under pressure. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

Total Release Fogger PR Notice 98-6 (40 CFR 156.78 d): ☐ Yes ☒ No ☐ NA

d. Label requires an additional Storage and Disposal statement: ☐ Yes ☒ No

Final decision of overall label acceptance will be made by the PM.

DP BAR CODE NO.: 428102

EPA File Symbol NO.: 239-ETGN

DECISION NO.: 505692

PC Code: 118401

ACTION CODE: R310

FOOD Use: No

7. Group **A & B**: Product Chemistry Data not required. The proposed product is a 100% repack of registered product under EPA Reg. [REDACTED]

Product ingredient source information may be entitled to confidential treatment

Product ingredient source information may be entitled to confidential treatment

DP BAR CODE NO.: 428102

EPA File Symbol NO.: 239-ETGN

DECISION NO.: 505692

PC Code: 118401

ACTION CODE: R310

FOOD Use: No

CONCLUSIONS:

1. CITAB has reviewed the CSF (Dated: 04/21/2015) for the proposed basic and finds it to be acceptable. The CSF is attached with this review and can be located in OPPIN CHEM DOCS.
2. The proposed product is a 100% re-pack of registered product EPA Reg. No. [REDACTED]
3. Product chemistry Group A and Group B data are not required.
4. The proposed label was screened as it pertains to the product chemistry requirements. The PM should get the "Formulation Type" from the registrant. The preferred site of insertion of Formulation Type would be on the proposed label under "Direction to Use". The proposed label contains following statements: (a) Keep out of reach of children (b) Hazards to Humans and Domestic Animals (c) Physical and Chemical Hazards. The final review of the proposed label and uses are the purview of the PM team.



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OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

Screen

DP BARCODE No.: D428102; FILE SYMBOL No.: 239-ETGN (screen); PRODUCT NAME: Ortho Roach Bait; DECISION No.: 505692; PC Code(s): 118401; ACTION CODE: R310; FOOD Use: No

DATE OUT: July 15, 2015

SUBJECT: Completeness check screening for end use product "Ortho Roach Bait"

FROM: Shyam Mathur,
Product Chemistry Team Leader
CITAB / RD (7505P)

SBM 7/15/15

TO: Elizabeth Fertich / Jennifer Urbanski, RM Team 04
I-V Branch 1 / RD (7505P)

Company Name: The Scotts Company
Formulation Type: Insecticide
Active Ingredient(s): Hydramethylnon (2.0%)
MRID Nos: 49645801, cited group B data (see data matrix 06-01-15)

CONCLUSION:

Deficiencies: No

(if there are deficiencies they are indicated below each heading as Note 1, Note 2 Etc).

Group A: All required data submitted

Attention: The product's chemical composition is same as in the product with Reg. No. [REDACTED], but the bait is packaged in different form.

Group B: All required data cited

Note 1: 830.6314 (oxidizing/reducing) –The product was found to be incompatible to oxidizing agents. The registrant is recommended to add the following warning on the product label under Physical-Chemical Hazards:

"Do not mix or allow coming in contact with oxidizing agent. Hazardous Chemical reaction may occur"

CSF: Basic CSF submitted (dated 04-21-2015; 100% re-pack of Reg. No. [REDACTED])

Note to PM: If the deficiencies are found in the screen results, please inform the registrant and bring back to author of this report or to Joe the corrected deficiencies in response to 10 day letter, so that it can be attached to the original bean, if the data package is still in CITAB. New Bean is required in case the bean has been closed by CITAB. Thank you.

Product ingredient source information may be entitled to confidential treatment

Fertich, Elizabeth

From: Bohnenblust, Eric
Sent: Thursday, September 10, 2015 8:44 AM
To: Fertich, Elizabeth
Subject: Efficacy Screen 239-ETGN

Beth,

The DP containing efficacy data for 239-ETGN passed the screen.

Eric Bohnenblust, Ph.D
Entomologist
Invertebrate & Vertebrate Branch 2
Phone: 703-347-0426
Email: Bohnenblust.eric@epa.gov



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OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

DP BARCODE No.: D428102; **FILE SYMBOL No.:** 239-ETGN (screen); **PRODUCT NAME:** Ortho Roach •
Bait; **DECISION No.:** 505692; **PC Code(s):** 118401; **ACTION CODE:** R310; **FOOD Use:** No

DATE OUT: July 15, 2015

SUBJECT: Completeness check screening for end use product "Ortho Roach Bait"

FROM: Shyam Mathur,
Product Chemistry Team Leader
CITAB / RD (7505P)

TO: Elizabeth Fertich / Jennifer Urbanski, RM Team 04
I-V Branch 1 / RD (7505P)

Company Name: The Scotts Company
Formulation Type: Insecticide
Active Ingredient(s): Hydramethylnon (2.0%)
MRID Nos: 49645801, cited group B data (see data matrix 06-01-15)

CONCLUSION:

Deficiencies: No

(if there are deficiencies they are indicated below each heading as Note 1, Note 2 Etc).

Group A: All required data submitted

Attention: The product's chemical composition is same as in the product with Reg. No. [REDACTED], but the bait is packaged in different form.

Group B: All required data cited

Note 1: 830.6314 (oxidizing/reducing) –The product was found to be incompatible to oxidizing agents. The registrant is recommended to add the following warning on the product label under Physical-Chemical Hazards:

"Do not mix or allow coming in contact with oxidizing agent. Hazardous Chemical reaction may occur"

CSF: Basic CSF submitted (dated 04-21-2015; 100% re-pack of Reg. No. [REDACTED])

Note to PM: If the deficiencies are found in the screen results, please inform the registrant and bring back to author of this report or to Joe the corrected deficiencies in response to 10 day letter, so that it can be attached to the original bean, if the data package is still in CITAB. New Bean is required in case the bean has been closed by CITAB. Thank you.

Product ingredient source information may be entitled to confidential treatment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

July 13, 2015

SIMILARITY CLINIC MEMORANDUM:

Subject: ORTHO ROACH BAIT
EPA File Symbol: 239-ETGN
DP Barcode 428079
Action Code: R310
PC Code: 118401 (Hydramethylnon)

From: Byron T. Backus, Toxicologist
CITAB
Registration Division (7505P)

Byron T. Backus
July 13, 2015
JCR

To: Jennifer Urbanski, RM 04
IVB1
Registration Division (7505P)

Applicant: The Scotts Company LLC
14111 Scottslawn Road
Marysville, OH 43041

FORMULATION FROM LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Hydramethylnon	2.0%
<u>Other Ingredients:</u>	98.0%
Total	100.0%

BACKGROUND: The registrant is claiming similarity of EPA File Symbol 239-ETGN to EPA Reg. No. [REDACTED], and is also selectively citing acute toxicity studies to support the registration. The MRIDs of the cited acute toxicity studies are as follows: 40658204 (OCSP 870.1100), 43093901 (870.1200), 40658204 (870.2400), 40658204 (870.2500), and 40658205 (870.2600).

After reviewing the Data Evaluation Reports (DERs) for these MRIDs, it is noted that the citation (MRID 43093901) for the acute dermal toxicity study is incorrect. The study in MRID 43093901 is a dermal absorption study; an examination of the review (TXR 0011163) for that

study indicates there was no determination of a dermal LD₅₀ value. However, a dermal toxicity study (LD₅₀ > 2000 mg/kg; toxicity category III) was included in the four studies submitted in MRID 40658204, and all four studies in MRID 40658204 (as well as the guinea pig dermal sensitization study in MRID 40658205) were classified as acceptable in a review (TXR 0006813) dated August 3, 1988.

No inhalation study (81-3 or 870.1300) has been cited; it is indicated in the data matrix "Waiver submitted." There is no indication in OPPIN that either an inhalation waiver request or inhalation study was submitted for [REDACTED]. Because [REDACTED] and 239-ETGN are gels, it would be technically difficult to conduct an inhalation study. In addition, an acute inhalation study (MRID 42871101) with rats was conducted on technical (95%) hydramethylnon; this study has been accepted by HED (TXR 0010822, memorandum dated 03/08/94). The reported 4-hour inhalation LC₅₀ values (with 95% confidence limits) based on analytical values of the active were: males 3.1 (2.0-4.6) mg/L; females 3.4 (2.0-4.6) mg/L; and combined sexes 2.9 (2.3-3.7) mg/L. The reported value for combined sexes is obviously incorrect (it should be between the LC₅₀ values for males and females, and at 2.9 mg/L 2/5 males and 1/5 females died), so the combined sex LC₅₀ would be greater than 2.9 mg/L. In any case, technical (95%) hydramethylnon is in toxicity category IV for inhalation toxicity, and (after an examination of the CSFs for 239-ETGN and [REDACTED]) we can assign 239-ETGN (2% hydramethylnon) to toxicity category IV by this exposure route with MRID 42871101 as a data citation.

RECOMMENDATIONS:

- The data matrix should be revised to indicate the citation for the acute dermal toxicity study is MRID 40658204.
- The data matrix indicates (for the acute inhalation toxicity study) "Waiver submitted." There is no indication in OPPIN that an inhalation waiver request was submitted for [REDACTED] but there is also no indication that an inhalation study was submitted. The registrant can cite the inhalation study (MRID 42871101) on technical (95%) hydramethylnon to satisfy this data requirement which would result in assignment of 239-ETGN (2% hydramethylnon) to toxicity category IV by this exposure route. Alternatively, the registrant can submit a waiver request.
- With the revisions indicated above in the data matrix for the acute dermal and inhalation toxicity studies, the cited acute toxicity studies would be acceptable to support the registration of 239-ETGN.

Product ingredient source information may be entitled to confidential treatment

With the revisions in the data matrix, the acute toxicity profile for EPA File Symbol 239-ETGN would be:

Acute Oral	IV	Cited (LD ₅₀ both sexes > 5000 mg/kg)
Acute Dermal	III	Cited (LD ₅₀ both sexes > 2000 mg/kg)
Acute Inhalation	IV	Cited (LC ₅₀ both sexes > 2.9 mg/L) or waiver request
Primary Eye	IV	Cited (no irritation)
Primary Dermal	IV	Cited (very slight irritation)
Skin sensitization	non sensitizer	Cited (guinea pig study)

LABELING:

PRODUCT ID #: 000239-02730

PRODUCT NAME: ORTHO ROACH BAIT

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Wear (specify any appropriate protective clothing, if appropriate).

First Aid:

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.



The Scotts Company LLC

and Subsidiaries

June 1, 2015

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

ATTN: Jennifer Urbanski, PM #4

SUBJECT: Ortho Roach Bait
EPA File Symbol 239-NEW
PRIA Category: R310

Dear Ms. Urbanski:

The Scotts Company d/b/a The Ortho Group (hereafter "Scotts") is submitting an application for registration of a new end-use product, Ortho Roach Bait containing 2.0% of the registered active ingredient hydramethylnon.

This product is a gel, and is 100% composition of [REDACTED]

[REDACTED] Scotts is obtaining the same formula from [REDACTED]

and will additionally repackage into a station to be sold as a consumer product.

For the master label, in addition to the existing commercial directions, Scotts has added a consumer syringe and station section and updated the directions for use accordingly. Additional efficacy claims have also been added to the label and supported by the enclosed efficacy study.

Since Scotts is submitting the additional efficacy with this action; this action qualifies as a R310, with a fee of \$5048.00 and a 7 month review time. Jennifer, per our conversation and subsequent email dated May 13, 2015, a [REDACTED]

Two studies are enclosed to support this registration:

- Efficacy study supporting additional claims on the label and;
- Product Chemistry (Group A) to support our manufacturing process

Additionally, to satisfy acute toxicity and product chemistry, Scotts is relying on data submitted by [REDACTED] and a letter of authorization (LOA) is included. A formulator's exemption statement is also included to satisfy generic data requirements. For any/all other product performance data, Scotts is relying [REDACTED] data as well as other data submitters. Therefore, we are using the cite-all under the selective method for efficacy, and offer to pay letters have been submitted to the companies listed on the data submitters list who submitted data for efficacy (Pesticide Data Submitters List dated March 31, 2015).

The enclosed Transmittal document outlines the documents in support of this registration.

Please contact me at 937-578-5984 or by email at Jane.Rothwell@Scotts.com should you have any questions regarding this application.

Regards,

Jane Rothwell
Senior Analyst, Regulatory Affairs
Enclosures

TRANSMITTAL DOCUMENT

1. NAME AND ADDRESS OF SUBMITTER:

The Scotts Company d/b/a The Ortho Group
PO Box 190
Marysville, Ohio 43040

2. REGULATORY ACTION IN SUPPORT OF WHICH THIS PACKAGE IS SUBMITTED:

Application for registration of new product: **Ortho Roach Bait**: EPA File Symbol: **239-NEW**

3. TRANSMITTAL DATE:

June 1, 2015

4. LIST OF SUBMITTED STUDIES:

Volume	Study Title	Guideline Number	MRID
I	<u>Administrative Materials</u> Cover Letter Transmittal Document Receipt of Payment of PRIA fee: R310 , 7 month review EPA Form 8570-1, Application for Pesticide Registration Product label – (one copy)(one on cd) EPA Form 8570-4, Confidential Statement of Formula-(CSF)- BASIC (two (2) copies) (4-21-15) EPA Form 8570-27, Formulator's Exemption EPA Form 8570-34, Certification with Respect to Data Citation EPA Form 8570-35, Data Matrix (EPA and public versions) Letter of Authorization (LOA) [REDACTED]	N/A	
II	Product Identity, Composition and Analysis for Ortho Roach Bait, 239-NEW; Author: Laura Allen; The Scotts Company LLC; Study #: SS-335A, May 27, 2015, 18 pages (plus 4 pages Confidential Attachment); (3 copies)	830.1550 830.1600 830.1650 830.1670 830.1750 830.1800	49645801
III	Efficacy of a gel-bait formulation containing 2.0% hydramethylnon for use in an indoor bait station,	810.3000	

Product ingredient source information may be entitled to confidential treatment

PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 6-5-15

Experts In-Processing Signature: B.B. Date 6-8-15 Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: 239-ET6N EPA Receipt Date: 6-5-15

Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All inerts, including fragrances, approved for the proposed uses (see Footnote A) <u>n/a ; repack</u>	yes	no			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)	X				
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (Electronic labels on CD are encouraged and guidance is available)			X		
7	Is the data package consistent with PR Notice 86-5			X		
8	Notice of Filing included with petitions					X

9	If applicable for conventional applications, <u>reduced risk rationale</u>			X
	<u>Required Data</u> and/or data waivers. See Footnote C.			
10	a) List study (or studies) not included with application			

Comments:

Documentation : Pass

Required forms are complete

Inerts : N/A

100% repack

11-3 : Pass

MRID 496458

Status : Pass

KC 6.11.2015

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

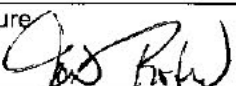
B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



United States
Environmental Protection Agency
Washington, DC 20460

Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address The Scotts Company d/b/a The Ortho Group Post Office Box 190 Marysville, OH 43040	EPA File Symbol/Registration Number 239-NEW									
	Product Name Ortho Roach Bait									
	Date of Confidential Statement of Formula (EPA Form 8570-4) 4-21-2015									
<p>As an authorized representative of the applicant for registration of the product identified above, I certify that:</p> <p>(1) This product contains the following active ingredient(s):</p> <p>hydramethylnon</p> <p>(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).</p> <p>(3) Indicate by checking (A) or (B) below which paragraph applies:</p> <p><input checked="" type="checkbox"/> (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).</p> <p style="text-align: center;">OR</p> <p><input type="checkbox"/> (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.</p> <p>(4) The following active ingredients in this product qualify for the formulator's exemption.</p> <table border="1" data-bbox="183 1297 1500 1711"> <thead> <tr> <th data-bbox="183 1333 630 1365">Active Ingredient</th> <th data-bbox="630 1333 1084 1365">Product Name</th> <th data-bbox="1084 1333 1500 1365">Registration Number</th> </tr> </thead> <tbody> <tr> <td data-bbox="183 1365 630 1501">hydramethylnon</td> <td data-bbox="630 1365 1084 1501">[REDACTED]</td> <td data-bbox="1084 1365 1500 1501">[REDACTED]</td> </tr> <tr> <td colspan="3" data-bbox="183 1501 1500 1711"> <p>*Product ingredient source information may be entitled to confidential treatment*</p> </td> </tr> </tbody> </table>		Active Ingredient	Product Name	Registration Number	hydramethylnon	[REDACTED]	[REDACTED]	<p>*Product ingredient source information may be entitled to confidential treatment*</p>		
Active Ingredient	Product Name	Registration Number								
hydramethylnon	[REDACTED]	[REDACTED]								
<p>*Product ingredient source information may be entitled to confidential treatment*</p>										
Signature 	Name and Title Jane Rothwell, Sr. Analyst, Regulatory Affairs	Date June 1, 2015								



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

 401 M Street, S.W.
 WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address and Telephone Number The Scotts Company d/b/a The Ortho Group P.O. Box 190, Marysville, OH 43040 (937)-578-5984	EPA Registration Number/ File Symbol 239-NEW
Active Ingredient(s) and/or representative test compound(s): Hydramethylnon, CAS No. 67485-29-4	Date June 1, 2015
General use pattern(s) (list all those claimed for this product using 40 CFR Part 158) Indoor	Product Name Ortho Roach Bait

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data Call-In Notice is supported by all data submitted or cited in the application for registration, the form for reregistration, or this Data Call-In response. In addition, if cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original submitter or that I have obtained the written permission of the original submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the written permission of the original data submitter to use this study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date June 1, 2015	Typed or Printed Name and Title Jane Rothwell, Sr. Analyst, Regulatory Affairs
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date June 1, 2015	EPA Reg. No./File Symbol 239-NEW	Page 1 of 2			
Applicant's/Registrant's Name & Address: The Scotts Company d/b/a The Ortho Group P.O. Box 190 Marysville, OH 43040		Product Ortho Roach Bait			
Ingredient(s): Hydramethylnon CAS No. 67485-29-4					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note

830.1550	Product Identity and Composition	submitted	The Scotts Co. No. 239	OWN	
830.1600	Description of the Materials Used to Produce the Product	submitted	The Scotts Co. No. 239	OWN	
830.1650	Description of the formulation process	Submitted	The Scotts Co. No. 239	OWN	
830.1670	Discussion of Formation of Impurities	submitted	The Scotts Co. No. 239	OWN	
830.1700	Preliminary Analysis	Not required	-	Not required	
830.1750	Certified Limits	submitted	The Scotts Co. No. 239	OWN	
830.1800	Enforcement Analytical Method	submitted	The Scotts Co. No. 239	OWN	
830.6302	Color	45000601(1999) 45299602(2001) 45299603(2001)	BASF Co. No. 241	PER	
830.6303	Physical State	45000601(1999) 45299601(2001) 45299602(2001)	BASF Co. No. 241	PER	
830.6304	Odor	Not required	-	Not required	
830.6314	Oxidation/reduction:chemical incompatibility	✓45000601(1999) 45299601(2001) 45299602(2001)	BASF Co. No. 241	PER	
830.6315	Flammability	Not required	-	Not required	
830.6316	Explosability	45000601(1999) 45299601(2001) ✓45299602(2001)	BASF Co. No. 241	PER	
830.6317	Storage Stability	45000601(1999) 45299601(2001) ✓45299602(2001)	BASF Co. No. 241	PER	
830.6319	Miscibility	Not required	-	Not required	
830.6320	Corrosion Characteristics	✓45000601(1999) 45299601(2001) 45299602(2001)	BASF Co. No. 241	PER	
830.6321	Dielectric Breakdown Voltage	Not required	-	Not required	

Signature 	Name and Title: Jane Rothwell, Sr. Analyst, Regulatory Affairs	Date June 1, 2015
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date June 1, 2015		EPA Reg. No./File Symbol 239-NEW		Page 2 of 2	
Applicant's/Registrant's Name & Address: The Scotts Company d/b/a The Ortho Group P.O. Box 190 Marysville, OH 43040		Product Ortho Roach Bait			
Ingredient(s): Hydramethylnon CAS No. 67485-29-4					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7000	pH	45000601(1999) 45299601(2001) 45299602(2001)	BASF Co. No. 241	PER	
830.7100	Viscosity	Not required	-	Not required	
830.7300	Density	45000601(1999) 45299601(2001) 45299602(2001)	BASF Co. No. 241	PER	
870.1100	Acute Oral Toxicity (rats)	40658204(1988)	BASF Co. No. 241	PER	
870.1200	Acute Dermal Toxicity (rats)	43093901(1993)	BASF Co. No. 241	PER	
870.7600	Dermal absorption	43093901(1993)	BASF Co. No. 241	PER	
870.1300	Acute Inhalation Toxicity	Waiver submitted	BASF Co. No. 241	PER	
870.2400	Primary Eye Irritation (rabbits)	40658204(1988)	BASF Co. No. 241	PER	
870.2500	Primary Dermal Irritation (rabbits)	40658204(1988)	BASF Co. No. 241	PER	
870.2600	Skin Sensitization (guinea pigs)	40658205(1988)	BASF Co. No. 241	PER	
810.3000	Efficacy of a gel-bait formulation containing 2.0% hydramethylnon for use in an indoor bait station against German cockroaches (Blattella germanica) both nymphs and adults	submitted	The Scotts Co. No. 239	OWN	
810	Product performance Efficacy - We are proceeding under the cite all under the selective method of support for all other efficacy		ALL Efficacy Submitters	PAY	

97-90-90

Signature 	Name and Title: Jane Rothwell, Sr. Analyst, Regulatory Affairs	Date June 1, 2015
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 8, 2015

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-505692
EPA File Symbol or Registration Number: 239-ETGN
Product Name: ORTHO ROACH BAIT
EPA Receipt Date: 05-Jun-2015
EPA Company Number: 239
Company Name: THE SCOTTS COMPANY

JANE ROTHWELL
THE SCOTTS COMPANY
D/B/A THE ORTHO GROUP
P.O. BOX 190
MARYSVILLE, OH 43040

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R310

NEW END-USE OR MANUFACTURING USE PRODUCT WITH REGISTERED SOURCE(S) OF ACTIVE INGREDIENT(S); INCLUDES PRODUCTS CONTAINING TWO OR MORE REGISTERED ACTIVE INGREDIENTS PREVIOUSLY COMBINED IN OTHER REGISTERED PRODUCTS; REQUIRES REVIEW OF DATA PACKAGE WITHIN RD ONLY; INCLUDES DATA AND/OR WAIVERS OF DATA FOR ONLY; PRODUCT CHEMISTRY; ACUTE TOXICITY; PUBLIC HEALTH PEST EFFICACY; CHILD RESISTANT PACKAGING;

No additional payment is due at this time. If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 347-8961.

Sincerely,

A handwritten signature in black ink, appearing to be "m. j. k.", written over the word "Sincerely,".

Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service

if
{969403&~

This package includes the following

☒ New Registration

☐ Amendment

☒ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr. 4

Receipt No.

S- 969403

EPA File Symbol/Reg. No.

239-ETGN

Pin-Punch Date:

6/5/2015

☐ This item is NOT subject to FFS action.

Action Code:

Requested: R310

Granted: R310

Amount Due: \$ 5048⁰⁰

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: *K. M. M.*

Date: 6/8/15

Remarks: 100% repack PLUS additional efficacy
claims + data.

ScottsMiracleGro

McLain, Melissa <melissa.mclain@scotts.com>

Pay.gov Payment Confirmation: PRIA Service Fees

1 message

notification@pay.gov <notification@pay.gov>
To: melissa.mclain@scotts.com

Fri, May 29, 2015 at 7:15 AM

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Michael Yanchulis at (703) 347-0237 or yanchulis.michael@epa.gov.

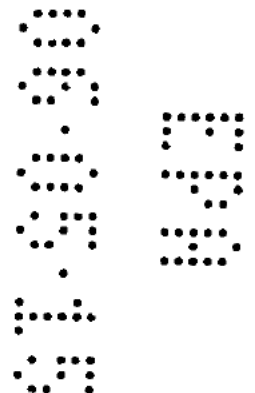
Application Name: PRIA Service Fees
Pay.gov Tracking ID: 25LIVMDR
Agency Tracking ID: 74812770388
Transaction Type: Sale
Transaction Date: 05/29/2015 07:15:19 AM EDT

Account Holder Name: Connie Christian

Transaction Amount: \$5,048.00
Billing Address: 14111 Scottslawn Rd.
Billing Address 2:
City: Marysville
State/Province: OH
Zip/Postal Code: 43041
Country: USA
Card Type: Visa
Card Number: *****3991

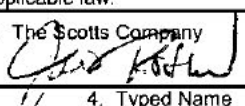
Registration Number: 239-NEW
Company Name: The Ortho Group
Company Number: 239
Action Code: R310

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 05-31-98

EPA United States Environmental Protection Agency Washington, DC 20460		<input checked="" type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 239-NEW		2. EPA Product Manager Jennifer Urbanski	
4. Company/Product (Name) The Ortho Group / Ortho Roach Bait		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) The Scotts Company d/b/a The Ortho Group PO Box 190 Marysville, OH 43040 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. [REDACTED] Product Name [REDACTED]	
Section II			
<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated <input type="checkbox"/> Notification - Explain below.		<input type="checkbox"/> Final printed labels <input checked="" type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - Explain below.	
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Submission of 100% of [REDACTED] PRIA Category R310; 7 month review time. See cover letter for details. Email: Jane.Rothwell@Scotts.com			
Section III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per Container 1g - 2g 8 - 12	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per Container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 8g - 24g	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Other <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
Section IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Jane Rothwell		Title Sr. Analyst, Regulatory Affairs	
		Telephone No. (Include Area Code) (937) 578-5984	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature The Scotts Company BY: 		3. Title Sr. Analyst, Regulatory Affairs	
4. Typed Name Jane Rothwell		5. Date June 1, 2015	



The Scotts Company LLC

and Subsidiaries

June 1, 2015

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

ATTN: Jennifer Urbanski, PM #4

SUBJECT: Ortho Roach Bait
EPA File Symbol 239-NEW
PRIA Category: R310

Dear Ms. Urbanski:

The Scotts Company d/b/a The Ortho Group (hereafter "Scotts") is submitting an application for registration of a new end-use product, Ortho Roach Bait containing 2.0% of the registered active ingredient hydramethylnon.

This product is a gel, and is 100% composition of [REDACTED]

[REDACTED] Scotts is obtaining the same formula from [REDACTED] and will additionally repackage into a station to be sold as a consumer product.

For the master label, in addition to the existing commercial directions, Scotts has added a *consumer* syringe and station section and updated the directions for use accordingly. Additional efficacy claims have also been added to the label and supported by the enclosed efficacy study.

Since Scotts is submitting the additional efficacy with this action; this action qualifies as a R310, with a fee of \$5048.00 and a 7 month review time. Jennifer, per our conversation and subsequent email dated May 13, 2015, a [REDACTED]

Two studies are enclosed to support this registration:

- Efficacy study supporting additional claims on the label and;
- Product Chemistry (Group A) to support our manufacturing process

Additionally, to satisfy acute toxicity and product chemistry, Scotts is relying on data submitted by [REDACTED] and a letter of authorization (LOA) is included. A formulator's exemption statement is also included to satisfy generic data requirements. For any/all other product performance data, Scotts is relying [REDACTED] data as well as other data submitters. Therefore, we are using the cite-all under the selective method for efficacy, and offer to pay letters have been submitted to the companies listed on the data submitters list who submitted data for efficacy (Pesticide Data Submitters List dated March 31, 2015).

The enclosed Transmittal document outlines the documents in support of this registration.

Please contact me at 937-578-5984 or by email at Jane.Rothwell@Scotts.com should you have any questions regarding this application.

Regards,

Jane Rothwell
Senior Analyst, Regulatory Affairs
Enclosures

14111 Scottslawn Road Marysville, Ohio 43041 937-644-0011

TRANSMITTAL DOCUMENT

1. NAME AND ADDRESS OF SUBMITTER:

The Scotts Company d/b/a The Ortho Group
PO Box 190
Marysville, Ohio 43040

2. REGULATORY ACTION IN SUPPORT OF WHICH THIS PACKAGE IS SUBMITTED:

Application for registration of new product: **Ortho Roach Bait: EPA File Symbol: 239-NEW**

3. TRANSMITTAL DATE:

June 1, 2015

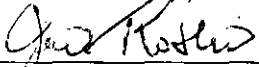
4. LIST OF SUBMITTED STUDIES:

Volume	Study Title	Guideline Number	MRID
I	<u>Administrative Materials</u> Cover Letter Transmittal Document Receipt of Payment of PRIA fee: R310 , 7 month review EPA Form 8570-1, Application for Pesticide Registration Product label - (one copy)(one on cd) EPA Form 8570-4, Confidential Statement of Formula- (CSF)- BASIC (two (2) copies) (4-21-15) EPA Form 8570-27, Formulator's Exemption EPA Form 8570-34, Certification with Respect to Data Citation EPA Form 8570-35, Data Matrix (EPA and public versions) Letter of Authorization (LOA) : [REDACTED]	N/A	
II	Product Identity, Composition and Analysis for Ortho Roach Bait, 239-NEW; Author: Laura Allen; The Scotts Company LLC; Study #: SS-335A, May 27, 2015, 18 pages (plus 4 pages Confidential Attachment); (3 copies)	830.1550 830.1600 830.1650 830.1670 830.1750 830.1800	
III	Efficacy of a gel-bait formulation containing 2.0% hydramethylnon for use in an indoor bait station,	810.3000	

Product ingredient source information may be entitled to confidential treatment

	against German cockroaches (<i>Blattella germanica</i>) both nymphs and adults. Authors: Matthew Rawlings, M.S., Ryan R. Newcomer, Date: April 27, 2015, The Scotts Company LLC, Seven (7) pages, Three (3) copies		
--	--	--	--

Company Official: Jane Rothwell, Sr. Analyst, Regulatory Affairs

Signature: 

Company Name: The Scotts Company d/b/a The Ortho Group

Company Contact: Jane Rothwell

Phone Number: 937-578-5984

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

Note to PM: This section for commercial use

ORTHO ROACH BAIT

RECOMMENDED FOR USE BY COMMERCIAL APPLICATORS

Syringe packaging is for use as a syringe or with other bait devices.

Cartridge packaging is for use with XACTADOSE[®] Precision Baiting System.

For Pressurized Bait System: The pressurized bait system package with the 4-inch extension tube is intended for precision baiting in a crack and crevice application.

FOR USE IN AND AROUND HOMES, COMMERCIAL, INDUSTRIAL, OR INSTITUTIONAL AREAS

ACTIVE INGREDIENT:

Hydramethylnon

[tetrahydro-5,5-dimethyl-2(1H)-pyrimidinone(3-[4-(trifluoromethyl)phenyl]-1-(2-[4-(trifluoromethyl)phenyl]ethenyl)-2-propenylidene)hydrazone]2.0%

OTHER INGREDIENTS:..... 98.0%

TOTAL: 100.00%

Keep out of reach of children. CAUTION

See back panel for additional First Aid, Precautionary Statements and Directions for Use

Use Only in Areas Not Easily Accessible to Children and Pets

Net weight xxxxxxxxxx

FIRST AID [icon]

HAVE LABEL WITH YOU WHEN OBTAINING TREATMENT ADVICE
IF SWALLOWED:

- Call a poison control center, doctor, or 1-800-225-2883 immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.

Hot line number: Have the product container or label with you when calling a poison control center or doctor or going for treatment. In case of emergency, call day or night 800-225-2883.

Note to PM: Bold italicized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: May be harmful if swallowed. Avoid contact with skin and clothing. Wash hands thoroughly after handling.

For Pressurized Bait System:

PHYSICAL AND CHEMICAL HAZARDS

Contents under pressure. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ THIS LABEL: Read this entire label and follow all use directions and use precautions. Use only for the sites, pests and application methods described on this label.

Do not apply this product in a way that will contact any person or pet.

[Insert Product name] may be used as a spot or crack and crevice treatment for the control of cockroaches (including carbamate, organophosphate and pyrethroid resistant strains) in and around homes and the non-food/feed areas of institutional, warehousing and commercial establishments (such as groceries and supermarkets; meat, poultry and shell egg grading plants; hotels and motels; hospitals and nursing homes; schools; laboratories; computer facilities; sewers; buses, boats, ships, trains, and planes; pet shops; and zoos). Nonfood areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries, and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

[Insert Product name] may be used only as a crack and crevice treatment in food/feed areas of restaurants and other commercial or institutional food handling establishments, and food manufacturing, processing, storage and warehousing facilities. Food areas include areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups) and distribution facilities. Serving areas (when food is exposed and facility is in operation) are also considered food areas. Serving areas are areas where prepared foods are served, such as dining rooms, but excluding areas where foods may be prepared or held.

APPLICATIONS OF THIS PRODUCT IN THE FOOD/FEE AREAS OF FOOD/FEE-HANDLING ESTABLISHMENTS OTHER THAN AS A CRACK AND CREVICE TREATMENT ARE NOT PERMITTED.

Keep exposed gel away from open food and food contact surfaces. Do not place treatments in locations where routine cleansing operations may transfer diluted bait to food or food preparation surfaces. Do not apply gel to areas where food, food utensils or food processing/food preparation surfaces may become contaminated. Do not apply to areas that are routinely washed such as: cracks and crevices in tops of tables, food preparation, and prepared food holding surfaces, as gel may be removed by washing. Do not apply to surfaces where the temperature exceeds 130°F. Examples include, but are not limited to, portions of stoves, ovens, grills, fume hoods, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers and hot water pipes. Care should be taken to avoid depositing gel onto exposed surfaces. If gel contacts an exposed surface, remove gel and wash exposed surface promptly. Do not apply gel to areas which have been recently sprayed with insecticide, and do not spray insecticide over gel as it may cause the bait to become repellent.

Application rate is dependent on level of infestation and species to be controlled. Numerous smaller placements will provide faster control than few larger spots, especially for German cockroach control. Pest population reduction will be apparent within a week or less.

Cockroaches become lethargic after ingesting the bait and some may be seen during daylight hours.

Note to PM: Bold Italicized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

For Syringe or Cartridge:

Cockroach Species	Application Rate (g/m ² infested)	Application Method
Small, such as German or brown-banded	0.25 - 0.50	Thin film or small spots
Large, such as American, smoky-brown or Oriental	0.5 - 1.0	Larger spots

For Pressurized Bait System:

Pressurized Bait System Application Rate: For low to moderate infestations of cockroaches, place 6-12 bait points per square meter. For heavy infestations of cockroaches, 12-24 bait points per square meter. The PRESSURIZED BAIT SYSTEM is approximately 0.04 grams per spot and occupies an area about 3 mm of space.

Cockroach Species		Application Rate (g/m ² infested)	Application Method
Small, such as German or brown-banded	Low to moderate infestation 0.24-0.50	Heavy infestation 0.5-1.0	Thin film or small spots
Large, such as American, smoky-brown or Oriental	0.5 - 1.0		Larger spots

The lower application rate should be used for low to moderate infestations and the higher rate for more severe infestations. Gel placements should be at or near harborages or aggregation areas, such as cracks and crevices, corners, or areas of movement.

Outdoor Use Directions: For use outdoors to control smokybrown, American, oriental, woods, and other outdoor cockroach species. Apply bait to likely points of entry or harborage sites, such as: the cracks and crevices around windows, doors, porches, sills and screens; holes where pipes or utilities enter a structure; expansion joints; beneath siding or shingles; around firewood piles; eaves; attic or soffit vents; weep holes in masonry; and similar sites. Also, apply bait in likely breeding areas, such as tree holes, behind palm fronds, basements, crawlspaces, attics, garages, or similar sites.

Priority treatment areas may be identified by visual inspection of such areas listed above or aided by trapping techniques or spot flushings.

For Syringe or Cartridge"

To apply gel, remove the cap on nozzle, touch the application tip to surface, and apply. Recapping the application tip after treatment is completed is recommended to preserve bait freshness. The bait will adhere to non-greasy or non-dusty surfaces and will remain palatable to cockroaches for at least 6 months. Repeat treatments as necessary to maintain adequate control.

For Pressurized Bait System: To apply gel, remove the cap on nozzle, touch the application tip to surface and apply. The bait will adhere to non-greasy or non-dusty surfaces and will remain palatable to cockroaches for at least 6 months. Repeat treatments as necessary to maintain adequate control.

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

**For syringe or cartridge:
STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal. Wrap used cartridge and place in a trash can.

**For pressurized Bait System:
STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in a cool, dry area away from heat or open flame.

DISPOSAL: This container may be recycled in the few but growing number of communities where steel aerosol can recycling is available. Before offering for recycling, empty the can by using the product according to the label. **DO NOT PUNCTURE OR INCINERATE!** If recycling is not available, wrap the container and discard in trash.

[Ortho [or insert sub-registrant company name] **[Guarantee:** If for any reason you, the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.

[phone icon] **Questions or Comments** Call 1-800-225-2883 or [visit our website] www.ortho.com [computer icon]

[Ortho & Your Environment:] [Your home is a place for family and pets to enjoy.] [That's why ORTHO® products are designed with care to provide effective solutions to insect problems inside your home.] [For best results, please follow instructions for appropriate usage, storage and disposal.]

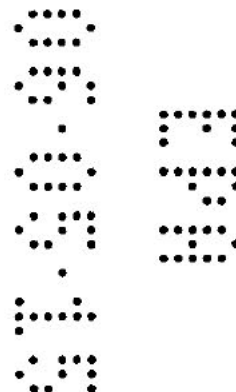
Manufactured for / Distributed For / Sold by:
The Ortho Group
P.O. Box 190
Marysville, OH 43040

[Product of / Made in U.S.A.]
[©XXXX] The Ortho Group, World Rights Reserved.

EPA Reg. No. 239-NEW

EPA Est. No.

[Superscript is first letter of lot number]



Note to PM: *Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.*

Note to PM: This Section for Consumer products packaged in a syringe or bait station

OUTER PACKAGE - COMPLETE LABEL

Alternate Brand Names:

Ortho Roach Bait Gel
Ortho Roach Killer Bait
Ortho Roach Killer Gel

Ortho Home Defense Roach Bait
Ortho Home Defense Roach Bait Gel
Ortho Home Defense Roach Killer Bait
Ortho Home Defense Roach Killer Gel

Ortho Home Defense MAX Roach Bait
Ortho Home Defense MAX Roach Bait Gel
Ortho Home Defense MAX Roach Killer Bait
Ortho Home Defense MAX Roach Killer Gel

Ortho Roach B Gon Roach Bait
Ortho Roach B Gon Roach Bait Gel
Ortho Roach B Gon Roach Killer Bait
Ortho Roach B Gon Roach Killer Gel

For Indoor residential use

ORTHO ROACH BAIT

ACTIVE INGREDIENT:

Hydramethylnon..... 2.0%

OTHER INGREDIENTS:98.0%
TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

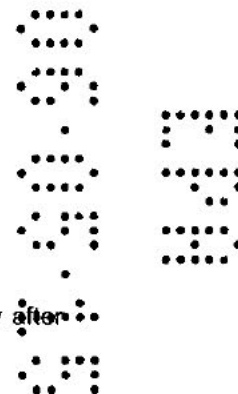
Refer to/see back/side panel[s] for additional Precautionary Statements, First Aid and Directions for Use.

Contains xx [xx oz (g)] Bait Stations
Total Net Contents xx oz (xx g)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: May be harmful if swallowed. Avoid contact with skin and clothing. Wash hands thoroughly after handling.



Note to PM: Bold italicized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

FIRST AID
<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
HOT LINE NUMBER
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1- 800-225-2883 for emergency assistance.</p> <p>Note to Physician: Emergency Information – call 1-800-225-2283.</p>

Note to pm- for product packaged in a Station

[The ORTHO Advantage] [Why/About Ortho [product name]] [How We Work] [How it Works]

[Ortho starts killing roaches in/with a *snap*] [...no, really!] It all starts with our [patented/exclusive/advanced] [Clean/Easy/Simple/One-] Snap [Activation] [Technology] bait stations. When you hear that satisfying *snap*, the station is ready for action. Inside the station is a carefully crafted cocktail/blend/mix/formula/bait [of/with food, water and *just* enough hard stuff to do the job [right]]. [It's the perfect snack for unsuspecting roaches scavenging for their next score.] Once we've lured roaches [in]to the bait [station], our work is done. Roaches naturally do the rest, spreading the bait to kill the [many] [other] roaches hiding in cracks and behind walls. [Remember that for every roach you see, there are hundreds you don't!]]

[Did you know: One visible roach typically means hundreds more are hiding?

That's where [product name] can help. It contains both food and water sources to draw roaches into the station. Roaches enter the station and eat the bait. When they leave, their natural behavior spreads the bait, killing the many other roaches hiding in cracks, crevices and behind walls.]

Note to pm- for product packaged in a Syringe

[The ORTHO Advantage] [Why/About Ortho [product name]] [How We Work] [How it Works]

[Ortho helps you reclaim your home from roaches with a potent mix of precision and power.] It all starts with the syringe, ideal for stealth/discreet placements [sure] to draw/stir roaches out of/from [their] hiding [places]. Inside each syringe is a carefully crafted cocktail/blend/mix/formula/bait [of/with food, water and *just* enough hard stuff to do the job [right]]. [It's the perfect snack for unsuspecting roaches scavenging for their next score.] Once we've lured roaches to the bait, our work is done. Roaches naturally do the rest, spreading the bait to kill the [many] [other] roaches hiding in cracks and behind walls. [Remember that for every roach you see, there are hundreds you don't!]]

[Did you know: One visible roach typically means hundreds more are hiding?

That's where [product name] can help. It contains both food and water sources to draw roaches to the bait. Roaches eat the bait and their natural behavior spreads the bait, killing the [many] other roaches hiding in cracks, crevices and behind walls.]

Note to PM- For product packaged in a Syringe or Bait Station

[HOW xx /product name WORKS]

- [xx/product name contains food and water sources to attract roaches.]
- [Roaches enter the station, eat the bait, then crawl away to die.]
- [Natural roach behavior spreads the bait to kill other roaches.]

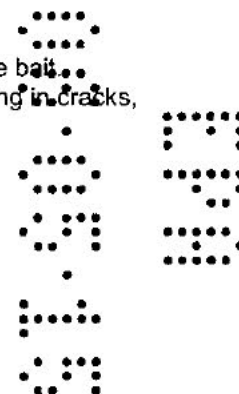
DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

READ ENTIRE LABEL. Use strictly in accordance with Precautionary Statements and Directions. Use bait only in areas inaccessible to children and pets.

Use Restrictions

239-NEW.20150511.me too of [REDACTED] Page 6 of 16



Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

- Do not use near food preparation surfaces
- Do not place bait near areas of excessive heat. [Examples include, but are not limited to: [portions of] stoves, ovens, grills, toasters, and dishwashers.]

Note to PM- For product packaged in a station

[1.] WHEN TO USE/APPLY: When roaches are present or [roach activity is] suspected.

[2.] WHERE TO USE/APPLY: Indoors where roaches are suspected or where they travel to find food, water or shelter. [[e.g.,] Kitchens/ Bathrooms/ Basements/ Garages/Laundry Rooms/ Porches/Terraces/Decks/Hardscapes.] [Common areas include: along baseboards, in corners of rooms and cabinets, under and behind appliances, under sinks, in pantry, on window sills, around doorways, [and] near garbage cans.]

Note to PM: optional illustrations may be used in conjunction with these steps.

[3.] HOW TO USE/APPLY: Note to PM: Dependent upon station design used, one or more of the these options will be on market label.

1. [Open carton and] Remove bait stations [from package/pouch]. [Optional Illustration]

2. [Separate stations [along perforation].

3. **[Option #1]**

[Open/Activate stations by peeling off label(s)/sticker(s)/film/strip to expose the bait inside.] [Optional Illustration]

[Option #2]

[To open/activate [the Clean/Easy/Simple/One- Snap] stations, snap open the end[s] [to expose bait inside].]

[Tuck/fold/hook the slit[s]/notch[es]/end flange[s]/hook[s] [around the [station's] outer edge] to hold back/secure [the] [Clean/Easy/Simple/One- Snap] tab[s]] [Optional Illustration]

[Option #3]

[Open/Activate stations by cutting along line/perforation/seam to expose bait inside.] [Optional Illustrations]

4. [Peel label off adhesive sticker on the back of the station.] [Optional Illustration]

5. [Place [the] station(s) [[with] THIS SIDE UP [facing upward]] in [out-of-the-way locations in] [the] area(s) [that] you have been experiencing or suspect roach activity.] [Optional Illustration]

6. [Replace the bait stations every 6 months, or sooner for heavy roach infestations.]

[4.] AMOUNT TO USE/APPLY:

For best results, use all [X] stations included in the package. [Additional stations may be needed to control heavy infestations.]

[5.] [WHEN TO REAPPLY: [Monitor regularly and] repeat treatments as necessary to maintain adequate control. [The bait will remain attractive to cockroaches for at least 6 months.]]

Note to PM- For product packaged in a Syringe

[1.] WHEN TO USE/APPLY: When roaches are present or [roach activity is] suspected.

[2.] WHERE TO USE/APPLY: Indoors along cracks and crevices where roaches are suspected or where they travel to find food, water or shelter. [[e.g.,] Kitchens/ Bathrooms/ Basements/ Garages/Laundry Rooms/ Porches/Terraces/Decks/Hardscapes.] [Common areas include: along baseboards, in corners of rooms and cabinets, under and behind appliances, under sinks, in pantry, on window sills, around doorways, [and] near garbage cans.]

[3.] HOW TO USE/APPLY: To apply, remove the cap on [the] nozzle, touch the application tip to the intended/desired surface, and apply in small dabs or lines across cracks and crevices. Recap the application tip after treatment is complete to preserve bait freshness.

[4.] AMOUNT TO USE/APPLY: For small roaches, [such as German or brown-banded,] apply one 2" - 4" strip of bait or one to two pea-sized dabs of bait every three feet in infested areas. For large roaches, [such as American, Oriental or smoky-brown], apply one to two 4" strips of bait or one to two dime-sized spots of bait every three feet in infested areas.

[5.] [WHEN TO REAPPLY: [Monitor regularly and] repeat treatments as necessary to maintain adequate control.

Note to PM: Bold italicized text is information for the reader and not part of the label. [Bracketed information is optional.] Text separated by / denotes and/or options.

[The bait will remain attractive to cockroaches for at least 6 months.]

Note to PM- For product packaged in a Syringe or Bait Station

[Optional]

[HELPFUL TIPS:]

- [Do not place bait stations in areas that have been recently sprayed with insecticide as this may reduce effectiveness.]
- [For heavy infestations, additional bait [stations] may be required.]
- [Monitor [bait] [stations] regularly for activity.]
- [[Once the [immediate] roach problem has been controlled,] use [Ortho Home Defense for Indoor & Perimeter, **Note to PM: EPA REG: 239-2718**] [product name] for [long lasting] [control of] [protection against] roaches [and] [many] [other] [home invading] [insects].]
- [[Once the [immediate] roach problem has been controlled,] use [Ortho Home Defense for Indoor & Perimeter, **Note to PM: EPA REG: 239-2718**] [product name] to create a [long lasting] [protective] barrier against roaches [and] [many] [other] [home invading] [insects].]

STORAGE AND DISPOSAL [icon][trash can]



PESTICIDE STORAGE: Keep out of reach of children and animals. Store in original pouch/package/container only. Store in a clean, dry, well ventilated place and avoid excess heat.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling, if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Note to PM- Warranty/Guarantee or notice statements may or may not appear on market label and will be company specific

[Ortho & Your Environment:] [Your home is a place for family and pets to enjoy.] [That's why ORTHO® products are designed with care to provide effective solutions to insect problems inside your home.] [For best results, please follow instructions for appropriate usage, storage and disposal.]

[ICON] [People and pets can enter/use the area while stations are in use]

Note to PM - Guarantee & Notice statements may or may not appear on market label

[Notice: To the extent consistent with applicable law, buyer assumes all risks of use, storage or handling of this product not in accordance with directions.]

[The Ortho [or insert sub-registrant company name] Guarantee: If for any reason you, the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.]

[phone icon] **Questions or Comments** Call 1-800-225-2883 [or] [visit our website] [www.ortho.com] [computer icon]

Manufactured for / Distributed for/by / Sold by:
The Ortho Group
P.O. Box 190
Marysville, OH 43040

[Product of / Made in U.S.A.]
[©XXXX] The Ortho Group, World rights reserved.

EPA Reg. No. 239-NEW
EPA Est. No. xxxxxxxx [Superscript is first letter of lot number]

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

BAIT STATION LABEL

[LABEL ON INDIVIDUAL BAIT STATION] *Note to PM: for products packaged in a station*

PRODUCT NAME

[For Indoor residential use]

ACTIVE INGREDIENT:

Hydramethylnon2.0%

OTHER INGREDIENTS:

98.0%
TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See outer carton for complete directions and precautionary statements.

Net Contents xx oz (xx g)

EPA Reg. No. 239-NEW

EPA Est. No. xxx. xxxx

[Superscript is first letter of lot number]

[This side down]

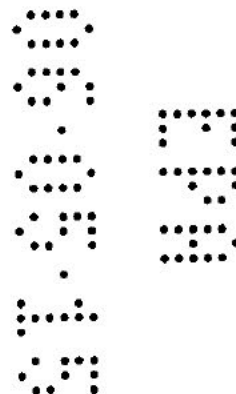
[Date bait placed: /]

[Manufactured for / Distributed for/by / Sold by

The Ortho Group

P.O. Box 190

Marysville, OH 43040]



Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

[LABEL ON INDIVIDUAL BAIT] Note to PM: for products packaged in a syringe

PRODUCT NAME

[For Indoor residential use]

ACTIVE INGREDIENT:

Hydramethylnon.....2.0%

OTHER INGREDIENTS:

98.0%
TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See outer carton for complete directions and precautionary statements.

Net Contents xx oz (xx g)

EPA Reg. No. 239-NEW

EPA Est. No. xxx. Xxxx

[Superscript is first letter of lot number]

[phone icon] Questions or Comments Call 1-800-225-2883 or [visit our website] www.ortho.com

[computer icon]

[Manufactured for / Distributed for / Sold by

The Ortho Group

P.O. Box 190

Marysville, OH 43040]

Note to PM: For product packaged in a syringe, the following are optional dependent upon what will fit on the actual package.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

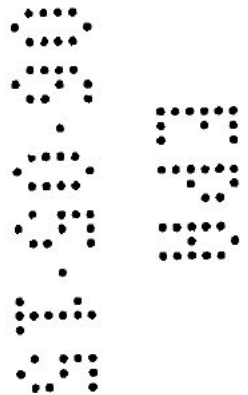
CAUTION: May be harmful if swallowed. Avoid contact with skin and clothing. Wash hands thoroughly after handling

FIRST AID	
<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person. 	
HOT LINE NUMBER	
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1- 800-225-2883 for emergency assistance.</p> <p>Note to Physician: Emergency Information – call 1-800-225-2283</p>	

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Note to PM: Any combination of approved claims from the master label may be inserted dependent upon sites listed on the market label and product size and packaging type (syringe vs station) Representation below.

[Brand] [Sub-Brand]	Ortho Roach Bait (or alternate brand name)
[Claims] 1. 2. 3. 4. 5.	Kills roaches and the eggs they carry Keeps killing for up to 6 months Starts working fast Guaranteed to work *[or your money back] Use [with confidence] in & around your home [insert approved claim(s) from master label]
[Product Facts:]	Product Facts:
[What it Does]	What it Does: Kills [all common] [the] [home infesting/invading] cockroaches you see and the ones/hundreds you don't [see].
[Where to Use/Apply]	Where to Use: [Use] indoors where roach activity is suspected or where they travel to find food, water or shelter. [e.g.,] [kitchens, bathrooms, basements, garages, porches].
[When to use/Apply]	When to Use: When roaches are present or roach activity is suspected



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NOTE TO PM: THE FOLLOWING CLAIMS MAY OR MAY NOT APPEAR ON ANY LABEL OR IN ADVERTISING. APPROPRIATE FORMULA AND COMPANY SPECIFIC INFORMATION WILL BE INSERTED ON FINAL PRINTED LABEL TO REPLACE "X"

NOTE TO PM: COCKROACHES AND ROACHES MAY BE USED INTERCHANGEABLY

CLAIMS FOR WHEN PACKAGED ONLY IN BAIT STATIONS

GENERAL PACKAGING CLAIMS

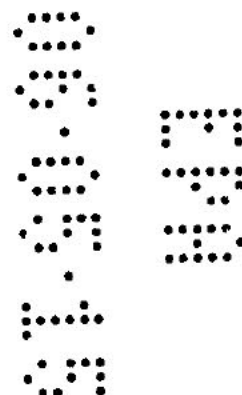
1. [X] Easy to Use Stations
2. [X] No Mess Stations
3. [X] Ready to Use Stations
4. Easy/Simple Activation [Stations]

STATIONS WITH NO ACTIVATION REQUIRED

5. No touch activation!
6. No Activation [Needed] [Required]!

STATIONS USING SNAP ACTIVATION TECHNOLOGY

7. [Patented/Exclusive/Advanced] Clean Snap [Activation] [Technology]
8. [X] Clean Snap [Activation] [Technology] Stations
9. [Patented/Exclusive/Advanced] Simple Snap [Activation] [Technology]
10. [X] Simple Snap [Activation] [Technology] Stations
11. [Patented/Exclusive/Advanced] Easy Snap [Activation] [Technology]
12. [X] Easy Snap [Activation] [Technology] Stations
13. [Patented/Exclusive/Advanced] One-Snap [Activation] [Technology]
14. [X] One-Snap [Activation] [Technology] Stations
15. [Patented/Exclusive/Advanced] Snap [Activation] [Technology]
16. [X] Snap [Activation] [Technology] Stations
17. [One-handed] [Clean] [Simple] [Easy] Snap Activation
18. One-hand activation
19. Snap activation
20. Activates in a Snap!



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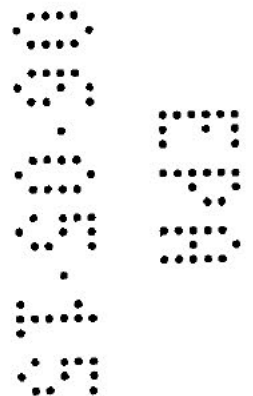
- 21. It's a snap!
- 22. Clean on You. Mean on Roaches.
- 23. Clean Activation. Mean Elimination.
- 24. Activate. Eliminate. Celebrate.

CLAIMS FOR ONLY WHEN PACKAGED IN A SYRINGE

- 25. For hard to reach places [such as cracks & crevices]
- 26. [For] spot application/treatment/use
- 27. [For] crack & crevice application
- 28. [For] precision/precise [placement] [application]
- 29. Discreet/Stealth roach control

GENERAL CLAIMS (applies to all packages)

- 30. Pre-filled [& Ready to Use]
- 31. No [Drips or] Spills
- 32. No Mess
- 33. Ready to Use
- 34. Continuous Action/Protection [Formula]
- 35. Odorless Bait [Formulation]
- 36. Easy to Use
- 37. Effective Roach Control/Protection [for up to] [6 months]
- 38. Lasts/Keeps Working for [up to] [1,2...6] months
- 39. [Provides] [Up to] 6 Month[s] Protection/Control
- 40. Kills/Protects/Controls [for] [up to] 6 months
- 41. Kills/Destroys/Eliminates/Controls Roaches [Fast]
- 42. Kills/Destroys/Eliminates/Controls roaches and the eggs they carry
- 43. Kills/Destroys/Eliminates/Controls generations of roaches
- 44. Kills/Destroys/Eliminates/Controls multiple generations of roaches
- 45. [A] multi-generation roach killer
- 46. Kills/Destroys/Eliminates/Controls roaches across generations
- 47. Kills/Destroys/Eliminates/Controls roaches across life stages
- 48. Kills/Destroys/Eliminates/Controls adult/adult[s] [roaches] and nymphs
- 49. Kills/Destroys/Eliminates/Controls roaches before you see them
- 50. Kills/Destroys/Eliminates/Controls while you sleep



Note to PM: *Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.*

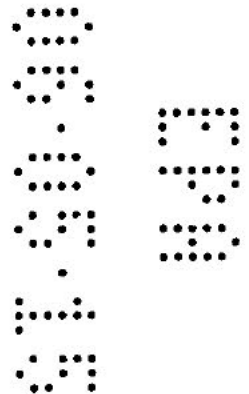
51. Fast Acting [Formula]
52. Starts killing in [less than] [48] hours
53. Starts killing in [less than] 2 days
54. [Visible] results in [less than] [48] hours
55. [Visible] results in [less than] 2 days
56. Starts killing fast
57. Starts working immediately [upon/at/after feeding]
58. Starts to work immediately [upon/at/after feeding]
59. Starts working fast
60. Kills fast, kills many
61. [Fast Acting] [Long Lasting] [Roach Control]
62. Controls/Stops/Eliminates roaches in 7 days/1 week
63. Controls/Stops/Eliminates [roach] infestation(s) in [as few/little as] 7 days/1 week
64. Kills/Destroys/Eliminates/Controls [both] large and small roaches
65. Kills/Destroys/Eliminates/Controls [all common] home invading cockroaches
66. Protects against [all common] home invading cockroaches
67. Kills/Destroys/Eliminates/Controls [all common] home infesting cockroaches
68. Protects against [all common] home infesting cockroaches
69. Kills/Destroys/Eliminates/Controls roaches where they live/hide/breed
70. Kills/Destroys/Eliminates/Controls roaches at the source [of the infestation]
71. Kills/Destroys/Eliminates/Controls roaches you see and roaches/those you don't [see]
72. Kills/Destroys/Eliminates/Controls [the] roaches you see and the hundreds you don't [see]
73. Guaranteed* [Kill] [or your money back] *[insert Ortho guarantee]
74. Guaranteed to work* [or your money back] *[insert Ortho guarantee]
75. Kills/Destroys/Eliminates roaches where they hide/live/breed &/and controls/eliminates infestations in [as little as] 7 days/1 week[!]
76. Kills/Destroys/Eliminates roaches where they hide/live/breed to control/eliminate infestations in [as little as] 7 days/1 week[!]
77. Starts killing/working fast & controls/eliminates infestations in [as little as] 7 days/1 week[!]
78. Kills/Destroys/Eliminates/ roaches at the source to control/eliminate roach infestations in [as little as] 7 days/1 week[!]
79. Advanced Bait Technology
80. Advanced Bait Formula

Note to PM: Bold Italized text is information for the reader and not part of the label. [Bracketed information is optional] Text separated by / denotes and/or options.

81. Attracts [roaches] fast and kills [roaches] fast
82. Attracts and kills/destroys/eliminates/controls roaches throughout your house/home⁺⁺ when used according to package directions.
83. Long Lasting [roach control] [protection]
84. Use [Ortho Home Defense Insect Killer for Indoor & Perimeter, **Note to PM: EPA REG: 239-2718**] [product name] for [long lasting] [control of] [protection against] roaches [and] [many] [other] [home invading] [insects].]
85. Use [Ortho Home Defense Insect Killer for Indoor & Perimeter, **Note to PM: EPA REG: 239-2718**] [product name] to create a [long lasting] [protective] barrier against roaches [and] [many] [other] [home invading] [insects].]
86. [For] Use [with confidence] in kitchens & bathrooms / [Basements]/ [Garages]/[Laundry Rooms]/ [Porches]/[Terraces]/[Decks]/[Hardscapes]/[Gardens]
87. [Helps] keep roaches from coming back
88. [Helps] protect against roaches coming back
89. [Helps] protect against roach infestations
90. Strong enough for urban roach[es] [populations] [infestations]
91. Strong enough for Southern roach[es] [populations] [infestations]
92. Strong enough for [Urban &/and Southern] [Southern &/and Urban] roach[es] [populations] [infestations]
93. Kills/Destroys/Eliminates/Controls [even] urban roach[es] [populations] [infestations]
94. Kills/Destroys/Eliminates/Controls [even] Southern roach[es] [populations] [infestations]
95. Kills/Destroys/Eliminates/Controls [even] [Urban &/and Southern] [Southern &/and Urban] roach[es] [populations] [infestations]
96. Kills [even] the toughest roaches
97. Works on hard to kill roaches
98. Kills [even] resistant [populations of] roaches
99. Roaches share/spread bait for maximum kill[ing] [effectiveness] [power]
100. Roaches share/spread bait for exponential kill[ing] [effectiveness] [power]
101. [Guaranteed to] start[s]/initiate[s] the [roach] death cycle
102. Start[s]/Initiate[s] the [ant] death cycle [guaranteed]
103. Helps/makes one roach kill many more [roaches]
104. Roaches don't stand a chance
105. [Don't play roach roulette.] [Get] Guaranteed Results!
106. Kitchen and/& bathroom approved [roach control]
107. Kitchen and/& bathroom friendly [roach control]
108. The Mean & Clean Way to Kill/Destroy/Eliminate/Control Roaches

VALUE CLAIMS (applies to all packages)

109. Value Pack/Size[!]
110. Bonus Pack/Size[!]
111. Combo Pack[!]
112. WOW Pack[!]
113. [X%] More [Bait [Stations]]
114. [X] Stations Free!



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OPTIONAL GRAPHICS:

Picture of station denoting compartments and contents

Picture of roaches

Picture of bait station/syringe

Pictures of bait station/syringe in use (kitchen, bathroom, basement, garage, porch, patio.) [illustration of bait station in use]

Pictures of where the bait can be used

Pictures of how the bait works

Pictures in Directions for use (removing from package, closing bait station, positioning station, etc.)

